C.2
4/10/98

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TECHLAW INC.

RZ2.R05052.01.ID.118

April 10, 1998

Mr. Gerald Phillips
U.S. Environmental Protection Agency
Region 5 D-8J
77 West Jackson Boulevard
Chicago, Illinois 60604

Reference: EPA Contract No. 68-W4-0006; Work Assignment No. R05052; Environmental Priorities Initiative (EPI) Assessments; Counselor Company, Rockford, Illinois, EPA I.D. No. ILD106918766; PA/VSI Report and NCAPS Scoring Report; Task 04 Deliverable

Dear Mr. Phillips:

Please find enclosed the Preliminary Assessment/Visual Site Inspection (PA/VSI) Report and the NCAPS Scoring Report for the referenced facility. The total migration score on the NCAPS is 34.31 with groundwater (44.82) and onsite (42.86) as the highest media-specific scores.

Should you have any questions or require additional information, please feel free to contact me at (312) 345-8963 or Mr. Rob Young at (312) 345-8966.

Sincerely,

Patricia Brown-Derocher

Patricia Brown-Derocher
Regional Manager

Enclosure

cc: F. Norling, EPA Region 5, w/o attachment
W. Jordan/Central Files
R. Young
Chicago Central Files

PRELIMINARY ASSESSMENT/VISUAL SITE INSPECTION REPORT
FOR
COUNSELOR COMPANY
ROCKFORD, ILLINOIS
EPA I.D. NO. ILD106918766

Submitted to:

Mr. Gerald Phillips
U.S. Environmental Protection Agency
Region 5 D-8J
77 West Jackson Boulevard
Chicago, Illinois 60604

Submitted by:

TechLaw, Inc.
20 North Wacker, Suite 1260
Chicago, Illinois 60606

EPA Work Assignment No.	R05052
Contract No.	68-W4-0006
TechLaw WAM	Mr. Rob Young
Telephone No.	312/345-8966
EPA WAM	Mr. Gerald Phillips
Telephone No.	312/886-0977

April 10, 1998

PRELIMINARY ASSESSMENT/VISUAL SITE INSPECTION REPORT
FOR
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APPENDICES

I. EXECUTIVE SUMMARY

The RCRA Facility Assessment (RFA) is the first step in implementing the corrective action provisions of the 1984 Hazardous and Solid Waste Amendments (HSWA) to the Resource Conservation and Recovery Act (RCRA). The purpose of the RFA is to identify environmental releases or potential releases from solid waste management units (SWMUs) and areas of concern (AOCs) that may require corrective action by the facility owner. A preliminary assessment/visual site inspection (PA/VSI) is a form of an RFA suitable for implementing the corrective action provisions of HSWA. This PA/VSI Report constitutes the reporting requirement for the RFA at the Counselor Company facility in Rockford, Illinois.

Prior to the VSI, a preliminary assessment (PA) of the available U.S. Environmental Protection Agency (U.S. EPA) and State of Illinois file materials was conducted. These files were reviewed for information related to past compliance history, evidence of past releases, potential migration pathways, potential for exposure to any released hazardous constituents, closure methods and dates, citizen complaints, manufacturing processes and waste management practices at the Counselor Company facility. These file materials were relied upon to provide the vast majority of the information in this report. A Visual Site Inspection (VSI) was conducted on November 4, 1997 by a TechLaw, Inc. (TechLaw) Team to identify and characterize potential solid waste management units (SWMUs) and areas of concern (AOCs.) A total of seven (7) SWMUs and no AOCs were identified. Photographs taken during the VSI and are included in Appendix A. Because of camera malfunction, several photographs noted in the VSI logbook were not actually taken. For this reason, copies of photos from previous Illinois Environmental Protection Agency (IEPA) RCRA Inspections are included in Appendix A. Photocopies of the VSI Field Notebooks are included in Appendix B, a figure displaying the facility layout and SWMU locations is included in Appendix C, locations of soil sampling (performed by other parties), data tables and data sheets are in Appendix D.

Section II of this report describes the site and includes regulation history, releases, a brief discussion of the SWMUs and the wastes managed in them, and environmental setting. Section III describes the SWMUs, including dates of operation, locations, physical descriptions, release histories, wastes managed, and potential for past/present release. Conclusions are in Section IV and References are listed in Section V.

A total of 7 SWMUs were identified. The Outdoor Waste Paint and Solvent Storage Area (SWMU 1) stored paint waste and solvents and the Alley Storage Area (SWMU 2) stored degreaser still bottoms (1,1,1-trichloroethane), waste oil and a container of scrap metal. The 2,000 Gallon Waste Oil Underground Storage Tank (SWMU 3) stored waste oil. The Satellite Accumulation Areas (SWMU 4) stored waste flammable liquid, paint filters, glue, solvent soaked rags, and 1,1,1-trichloroethane still bottoms.

The Unknown and Waste Oil Drum Storage Area (SWMU 5) stored drums containing waste oil and drums containing unknown waste. The Indoor Hazardous Waste Accumulation Area

(SWMU 6) stored waste paint, quench oil still bottoms, waste paint still bottoms, oil dry, glue, floor sweepings, paint filters, heat treat waste oil, paint still bottoms, degreaser still bottoms, paint room floor sweepings, rags with solvent, and waste oil/solvent. The Open Top Vapor Degreaser (SWMU 7) generated 1,1,1-trichloroethane still bottoms which were managed in SWMUs 1 and 6.

SWMUs 1, 2, and 5 have shown evidence of release. Both SWMUs 1 and 2 have had soil sampling and excavation performed. SWMU 1 was clean closed. SWMU 3 was excavated and had soil sampling performed.

II. SITE DESCRIPTION

The Counselor Company facility is located at 2017 Kishwaukee Street, in an industrial/residential area in the town of Rockford, Illinois. The facility is located on the northwest corner of the intersection of Blackhawk Park Avenue and Kishwaukee Street (Illinois Route 251.)

According to a January 30, 1990, IEPA RCRA Inspection Report, the facility manufactured bathroom scales for over fifty years. The facility was owned/operated by Brearly Industries until 1960 when Brearly Industries became Counselor Company. A May 24, 1995 letter addressed to IEPA from Baxter and Woodman, indicates that Counselor Company was purchased by the Newell Company in 1984. In 1989, Newell Company purchased the north building (see Figure 1, Appendix D.) According to a September 15, 1994 Regulatory Compliance Associates letter addressed to Dennis Priewe, IEPA, Counselor Company division of Newell Company was purchased by Sunbeam-Oster Household Products of Laurel Mississippi in late 1993. The Newell Company still owned the facility. Operations at the facility ceased in 1994 and the Newell Company leased the facility to two tenants; Alpha Bag and Process Graphics.

The Counselor Company facility is located on a four (4) acre parcel of land. There are two (2), two (2) story buildings at the site. The south (main) building was the location of all manufacturing processes. The north building was used for storage. The two buildings are joined at the eastern end. The remaining area between the buildings and at the west end of the facility is covered with concrete, however, soil is exposed in many places (see Photo Nos. 1-1, 1-2, and 1-3.)

According to the November 1, 1991 Revised Work Plan for Closure of a Hazardous Waste Storage Area prepared by Regulatory Compliance Associates, the facility manufactured a line of bathroom scales (Standard Industrial Classification Code 3612.) The operations conducted at the facility include the "punch press fabrication of components from steel coils, parts degreasing and assembly, automatic spray painting and assembly." A September 15, 1994 letter indicates that these operations included the operation of a washer line, caustic stripping tank, heat treating furnace and degreaser (SWMU 7.) These operations ceased in 1994 when the company was sold. All equipment and wastes were removed from the facility at this time. The current tenants, Alpha Bag and Process Graphics, manufacture and clean baghouse bags and produce point of purchase displays, respectively.

Figure 1 in Appendix C, shows the locations of facility SWMUs. According to an IEPA RCRA facility Inspection Report dated January 30, 1990, waste flammable liquid (F003-F005) was generated at the rate of eight (8) drums every 72 days when waste paint and waste thinner material was distilled to generate "still bottoms." Prior to 1990 this waste was stored in the Outdoor Waste Paint and Solvent Storage Area (SWMU 1), during 1990 and thereafter this waste was stored in Satellite Accumulation Areas (SWMU 4) and the Indoor Hazardous Waste Accumulation Area (SWMU 6.)

Waste glue (F005) was generated from the purging and cleaning of the glue applicator at a rate of ten (10) drums per year. It is not known where this waste was stored prior to 1990, after this date it was stored in the Indoor Hazardous Waste Accumulation Area (SWMU 6.) Waste oil was generated from the heat treating operation. It has never been manifested or analyzed. Prior to 1990, it was stored in the Outdoor Waste Paint and Solvent Storage Area (SWMU 1), the Alley Storage Area (SWMU 2), the 2,000 Gallon Waste Oil Underground Storage Tank (SWMU 3), and the Unknown and Waste Oil Drum Storage Area (SWMU 5). SWMU 5 was found to contain no more than fifty (50) barrels of waste oil in 1990. After 1990 the waste oil was stored in the Satellite Accumulation Areas (SWMU 4) and the Indoor Hazardous Waste Accumulation Area (SWMU 6). All waste was removed from the site in 1994.

Regulatory History

On March 18, 1974, an Air Pollution Episode Action Plan was prepared by John Brearley of Brearly Company, and submitted to IEPA. A "red alert" occurred at the facility and as a result painting and assembly operations were temporarily discontinued.

On October 4, 1982, IEPA issued Operating Permit No. 82100007, for the operation of a Blakeslee Open Top Degreaser (SWMU 7) to Counselor Company. The permit expired October 26, 1987 and was signed by Bharat Mathur, IEPA.

On December 1, 1983, IEPA issued Operating Permit No. 83110001, for the operation of Boiler #54212 to Counselor Company. The permit expired on November 1, 1988 and was signed by Bharat Mathur, IEPA.

The 1986 IEPA Generator Annual Hazardous Waste Report (dated February 12, 1987) states that Counselor Company generated 1,700 gallons of waste paint (D001) which was transported off-site by Aqua-Tech, Inc.

On June 6, 1986 Gregory Zak, IEPA, addressed a Compliance Inquiry Letter to Lyle Wade of Counselor Company, stating that Counselor may be in violation of the Illinois Environmental Protection Act and that Counselor has not complied with the 1985 Annual Hazardous Waste Reporting requirement for generators.

On August 6, 1986 Gregory Zak, IEPA, addressed a Pre-Enforcement Conference Letter to Lyle Wade of Counselor Company (Counselor). The letter states that Counselor had not addressed the violations stated in the June 6, 1986 letter and requested that Counselor attend a conference to discuss violations and arrive at a program to eliminate them. A September 15, 1986 IEPA Memorandum addressed to Greg Zak from Hope Wright, states that as of September 15, 1986, Counselor had not responded to the August 6, 1986 letter.

The 1987 IEPA Generator Annual Hazardous Waste Report (dated May 10, 1990) states that Counselor Company generated 2,420 gallons of "waste flammable liquid, paint" (F003, F005).

On June 9, 1987, IEPA issued Operating Permit No. 82100006, for the operation of Blakeslee Degreaser VSV SN# 10685 to Counselor Company. The permit expired on June 9, 1982 and was signed by Terry Sweitzer, IEPA.

On July 21, 1987, Eugene Theiosis of IEPA, addressed a letter to Counselor Company, stating that Counselor was in violation as it had not submitted a 1986 Annual Report for all hazardous waste shipped off-site and thus was in violation of 35 Ill. Adm. Code 722.141 (a.)

On July 28, 1987, Rick Nelson, Counselor Company, addressed a letter to Eugene Theiosis, IEPA, stating that Counselor sent a 1986 Annual Report to IEPA on February 12, 1987. He enclosed three (3) additional copies in the July 28, 1987 letter. According to a Status of Violations Form, signed by Hope Wright, IEPA, on July 30, 1987, this violation of 35 Ill. Adm. Code 722.141 (a) was resolved. Counselor Company was informed of this in a August 10, 1987 letter from Linda Kissinger, IEPA.

The 1988 IEPA Generator Annual Hazardous Waste Report (dated April 19, 1989) states that Counselor Company generated 1,430 gallons of waste flammable liquid, "N.O.S. flammable liquid, UN 1993" (D001) which was transported off-site by Strand Trucking.

On April 27, 1988, Eugene Theiosis, IEPA, addressed a Compliance Inquiry Letter to Rick Nelson of Counselor Company, informing him that Counselor had not submitted a 1987 Annual Report for hazardous waste shipment off-site.

Rick Nelson of Counselor Company responded to the April 27, 1988 letter in a September 28, 1988 letter addressed to Hope Wright of IEPA. Nelson stated that Counselor Company "entered into a complete paint and equipment changeover from high solvent paints to low solvent paints and no hazardous waste was removed form Counselor in the year 1987." Nelson attached a General Hazardous Waste Report to the letter.

The 1989 IEPA TSDR Facility Annual Hazardous Waste Report (dated May 10, 1990) states that Counselor Company generated 2,035 gallons of "waste flammable liquid, N.O.S. flammable liquid, UN 1993" (F003, F005) which was transported off-site by Strand Trucking, Inc., Northbranch Waste Oil Services, and Chance Freight Lines, Inc.

On March 24, 1989, Eugene Theiosis addressed a Compliance Inquiry Letter to the Counselor Company stating that Counselor had not submitted a General Hazardous Waste Report for 1988.

According to an IEPA Division of Land Pollution Control RCRA Inspection Report, the Counselor Company facility was inspected on January 30, 1990 by David Retzlaff. The Report states that, as a result of this investigation, the facility was regulated as a fully regulated generator

(G1), that stored hazardous waste in containers longer than 90 days without a permit (G5.) "Spillage" was observed on the gravel of the Outdoor Waste Paint and Solvent Storage Area (SWMU 1.) In addition, the following violations were found at the facility:

- No waste analysis was available for waste oils, waste paint analysis was not complete.
- Waste containers were dented and rusted.
- Containers were not kept closed.
- Containers were not inspected.
- Containers of ignitable waste were not kept greater than 50 feet from property boundary.
- Containers were not marked with accumulation start dates.
- Containers of hazardous waste were not labeled as to their contents.
- The facility was managed poorly.
- There were no communication devices near any of the accumulation areas.
- No arrangements had been made with appropriate authorities.
- There was no contingency plan.
- There was no personnel training program.
- The containers in satellite accumulation areas were unlabeled, in poor condition and uncovered.
- The facility did not submit a Part A application within thirty (30) days of becoming subject to section 725.
- There was no written waste analysis plan.
- There was no security or appropriate signs around waste storage areas.
- Inspections were not conducted.
- There was no telephone available in the area of operation.
- A closure plan and written estimate of closure costs were not available for the Outdoor Waste Paint and Solvent Storage Area (SWMU 1)
- No manifests were completed and given to a licenced special waste hauler prior to delivering the waste oil to the hauler.
- The facility generated hazardous wastes (F003, D001 and F005) not specified on their Notification of Hazardous Waste Activity Form 8700-12.

On March 14, 1990, Harry Chappel, IEPA, addressed a Pre-Enforcement Conference Letter to Rick Nelson of Counselor Company, in which he informed Counselor of the violations at the facility and invited Mr. Nelson to a pre-enforcement conference.

On April 3, 1990, David Retzlaff. IEPA. addressed a letter to Michael Fraser of Counselor Company. The purpose of the letter was to reiterate the items that were agreed to during the Pre-Enforcement Conference held on April 2, 1990. The items agreed to included the following:

- A detailed waste stream analysis was to be submitted to IEPA by May 14, 1990.
- Containers were to be cleaned and contents of damaged drums were to be transferred to undamaged drums.
- Containers were to be kept closed.
- All drums were to be moved to a secure location indoors.

- Inspections were to commence.
- Containers were to be moved to a location greater than fifty (50) feet from the property boundary.
- Accumulation dates were to be marked on each container.
- Hazardous waste labeling was to be implemented.
- A telephone was to be installed in the Paint Room, near the Satellite Accumulation Area (part of SWMU 4.)
- Arrangements with local authorities were to be arranged by May 14, 1990.
- A contingency plan was to be developed and submitted by May 14, 1990.
- A training program was to be initiated.
- No waste was to be stored longer than ninety (90) days.
- The facility was to be cleaned up.
- Facility annual reports for 1987, 1988 and possibly 1989 were to be submitted by May 14, 1990.
- The facility was to begin manifesting all waste oils and waste oil shipments.
- The facility was to submit a revised Notification of Hazardous Waste Activity Form 8700-12 to IEPA no later than May 14, 1990.

IEPA informed Counselor that many of these items would be confirmed during a follow-up inspection scheduled for April 30, 1990.

On April 3, 1990, Paul Dimock, U.S. EPA Region V, addressed a letter to Rick Nelson of Counselor Company, stating the following: "On January 30, 1990, the [IEPA] represented the [U.S. EPA], conducting a ...RCRA inspection of the...facility. The purpose of the inspection was to determine the facility's compliance with the applicable hazardous waste requirements of RCRA, including the Federal land disposal restrictions....With respect to the land disposal restrictions section of the inspection, your facility was found to be in compliance with the requirements."

On April 30, 1990, a follow-up inspection was conducted at the Counselor Company facility. According to the IEPA Division of Land Pollution Control RCRA Inspection Report completed by David Retzlaff, the following was observed. The entire facility, indoors and outdoors, had been cleaned up and organized. All waste streams had been evaluated. Satellite Accumulation Areas (SWMU 4) have been established. Hazardous wastes had been segregated, organized and placed in one Indoor Hazardous Waste Accumulation Area (SWMU 6.) The following items which were agreed upon in the April 2, 1990 pre-enforcement conference were determined to be in effect:

- All containers of hazardous waste were in good condition.
- All containers in satellite accumulation areas were kept closed and properly labeled.
- The facility was being maintained in an environmentally sound manner.
- There is a telephone near the hazardous waste accumulation area.
- All containers of waste were closed and were properly maintained.
- Inspections of containers were conducted.
- Ignitable wastes were kept greater than fifty (50) feet from property boundaries.

- There were accumulation dates on all containers of hazardous waste in the Satellite Accumulation Areas (SWMU 4.)
- All containers of hazardous waste are so labeled.

The following items remained outstanding:

- Appropriate arrangements with local authorities had not been made.
- A contingency plan had not been submitted to IEPA.
- Training was not completed and a written program was not available.
- Facility annual reports had not been submitted for 1987, 1988 and 1989.
- A Closure Plan for the Outdoor Waste Paint and Solvent Storage Area (SWMU 1) had not been submitted.

On May 11, 1990 Michael Fraser of Counselor Company addressed a letter to the Rockford Police Department, the Swedish American Hospital, and the Rockford Fire Department. In each, he enclosed a copy of the facility's Hazardous Waste Handbook containing a Preparedness and Prevention Plan. He stated that, per RCRA, he was required to submit this to the recipient and requested that the recipient review the plan to determine if they could provide services as required in the event of an emergency. He stated that if he had not heard from the recipient within ten (10) days, Counselor would assume that the recipient could provide services in the case of an emergency.

On May 11, 1990 Mark Young, of Fehr-Graham & Associates, acting for Counselor Company, addressed a letter to Hope Wright, IEPA, which enclosed TSD Facility Annual Reports for the years 1987, 1988 and 1989. This was done in pursuant to the Pre-Enforcement Conference Letter dated March 14, 1990.

On May 11, 1990 Mark Young, of Fehr-Graham & Associates, acting for Counselor Company, addressed a letter to Lawrence Eastep, IEPA in which he enclosed the Closure Plan for the Outdoor Waste Paint and Solvent Storage Area (SWMU 1.) The plan also contained sample analysis and descriptions of voluntary cleanup activity concerning the 2,000 Gallon Waste Oil Underground Storage Tank (SWMU 3) and the Alley Storage Area (SWMU 2.) This plan was submitted pursuant to the Pre-Enforcement Conference Letter dated March 14, 1990.

The Closure Plan stated that the 2,000 Gallon Waste Oil Underground Storage Tank (SWMU 3) was excavated on June 17, 1988 by FIW, Inc. (FIW) of Petatonica, Illinois. FIW removed the remaining waste oil, cleaned the tank and shipped the empty tank off-site. Soil samples were taken from the bottom of the tank imprint. The copy of the Analytical Reports for the composite of these samples is on Data Sheet 1. A more detailed description is contained in the SWMU Description section of this report.

The Closure Plan stated that soil samples have been taken for the Alley Storage Area (SWMU 2) and the Outdoor Waste Paint and Solvent Storage Area (SWMU 1). SWMU 2 had two soil samples taken from it, which were found to contain 1,1-dichloroethene, tetrachloroethene, and

1,1,1-trichloroethane (89,000 ng/g (parts per billion)). SWMU 1 had several soil samples taken from it and was found to be contaminated with cis-1,2-dichloroethene, methyl ethyl ketone, tetrachloroethene, toluene, 1,1,1-trichloroethane (140 ng/g), and trichloroethene. Waste had been re-drummed and removed from both units. Wastes stored in these units were moved to the Indoor Hazardous Waste Accumulation Area (SWMU 6.) These units are further addressed in the SWMU Descriptions section of this report.

IEPA Closure Plan Review Notes and Checklist for the May 1990 Closure Plan, dated May 14, 1990, have the following comments:

- Waste codes were not submitted.
- Sample grid spacing is satisfactory.
- Not enough information is submitted concerning releases.
- The Unknown and Waste Oil Drum Storage Area (SWMU 5) is not addressed.

This is the only time IEPA mentioned SWMU 5 and they took no action concerning it.

On May 23, 1990 Angela Tin, IEPA addressed a letter to Rick Nelson of Counselor Company stating that the facility was no longer in violation of the following sections of the Illinois Environmental Protection Act:

- 722.134 The containers in the satellite accumulation areas are kept closed and are properly labeled.
- 722.115 All containers appear to be in good condition.
- 725.131 The facility is currently being maintained in an environmentally safe manner.
- 725.132 There is a telephone near the hazardous waste accumulation area.

On June 8, 1990, Bill Radlinski, IEPA, addressed a letter to Rick Nelson of Counselor Company, informing him that the facility was no longer in violation of the following sections of the Illinois Environmental Protection Act:

- 722.111 A person who generates waste must determine if it is hazardous.
- 725.137 Arrangements must be made with local police, emergency response, hospitals, and state authorities.
- 722.151(a) The facility must have a contingency plan.
- 725.175 The owner and operator shall prepare and submit a single copy of an annual report to [IEPA] by March 1 of every year.
- 725.212(a) The owner or operator of a hazardous waste management facility must have a written closure plan.
- 725.242(a) The owner or operator shall have a detailed estimate of the cost of closing the facility.
- 3010(a) The owner or operator shall notify IEPA of the hazardous wastes generated at his/her facility.

According to Public Notice #90016, dated May 17, 1990 and titled Notice of Closure, Closure No. C539, IEPA informed the public the Counselor had submitted a Closure Plan and that it was available for review.

On June 15, 1990 Bill Radlinski, IEPA, addressed a letter to Rick Nelson of Counselor Company, stating the facility was in violation of Section 722.134(a): A generator must store waste in appropriate containers, label containers with the words "Hazardous Waste", mark containers with the start accumulation date, and comply with Emergency Preparedness, Contingency Plans and Personnel Training requirements.

On August 1, 1990, Lawrence Eastep, IEPA, addressed a letter to Peter Schultz of Counselor Company stating that, after review, the closure plan submitted in May 1990 has been disapproved. The following deficiencies were identified:

- The plan must address each hazardous waste unit at the facility, including the location size and raw material(s) used.
- The plan should describe each unit including a process code and unit of measure code. Include waste types for each unit, time period of use, dimensions, topography, and soil types.
- The location of the facility on a topographic map and a facility map showing SWMU locations should be provided.
- The plan should describe storage area containment surfaces and structures. Describe drainage features if containment structures are not present. Additional sampling and analysis must be proposed to determine the extent of releases.
- Provide a maximum inventory of wastes treated, stored or disposed of in each area.
- In order to dispose of hazardous waste and nonhazardous special waste which may result from cleanup activities an application for a Waste Stream Permit must be submitted to IEPA by the generator.
- Clean closure of a unit requires the removal of all contaminated materials. If a site-specific cleanup level is proposed the generator must document that contaminants left in the soil will not adversely impact environmental media or result in a threat to human health. Cleanup levels for soil and/or groundwater depend a great extent on the existing and potential use of groundwater and/or surface water in the area surrounding the facility.
- Closure of hazardous waste management units must include sampling of soil to demonstrate clean closure or to determine the extent of contamination. Sampling and analysis activities should follow U.S. EPA guidelines.
- The closure plan should clearly define how soil will be removed, stored, loaded, and managed once it leaves the property.
- Equipment decontamination must be described.
- A certification statement signed by the owner/operator and an independent professional engineer must be submitted to IEPA for the closure of each unit.
- A statement of the facility status after closure, such as less than ninety (90) day storage, must be stated in the Closure Plan.

On August 22, 1990, Peter Schultz of Counselor Company addressed a letter to David Retzlaff concerning the Alley Storage Area (SWMU 2.) The letter states that the procedure for handling scrap metal was changed to eliminate seepage of oil from the container which may result in contamination of the soil. The letter further states that some areas of soil in this unit were

exposed and covered with an oily stain. Environment, Inc. was retained by Counselor to perform a test excavation and appropriate sampling and analysis to describe the nature and extent of the contamination in the soil. The first excavation was conducted on July 18, 1990, samples were taken from the base of excavation pits. Sample analysis indicated the presence of a chlorinated solvent. A second excavation took place on July 31, 1990; samples were again taken. Analysis results indicated no detection of any contaminants. A total of forty (40) cubic yards of soil had been excavated from this unit. This work is further detailed in the SWMU description for SWMU 2.

On August 29, 1990, Mark Young of Fehr-Graham & Associates, acting for Counselor Company, addressed a letter to Lawrence Eastep, IEPA, stating that per IEPA's August 1, 1990, letter addressed to Peter Schultz, Counselor Company was submitting a new, enclosed Closure Plan for review and approval.

On October 3, 1990, Lawrence Eastep, IEPA, addressed a letter to Peter Schultz, Counselor Company, stating that, after review, IEPA approved their August 1990 Closure Plan subject to the following conditions and modifications:

- Closure activities must be finished by April 15, 1991, and certification submitted to IEPA by June 15, 1991.
- IEPA reserves the right to amend the closure plan.
- If contamination is detected, IEPA must be notified and a revised closure plan addressing remediation must be submitted to IEPA.
- All cleanup operations must meet the applicable requirements of OSHA.
- A closure plan must be prepared for the Alley Storage Area (SWMU 2.) IEPA does not consider this unit closed.
- The gravel and concrete surfaces which from the base of the Outdoor Waste Paint and Solvent Storage Area (SWMU 1) and the Alley Storage Area (SWMU 2), respectively, must be visually inspected to determine if any cracks exist which could allow waste to migrate into the underlying soil and to determine if any waste residue remains. Soil samples must be taken if cracks are found and any hazardous waste residues remaining must be removed.
- All samples must be analyzed individually. IEPA regulations concerning sampling must be adhered to.
- Any site-specific cleanup objective proposals must be submitted to IEPA, otherwise, IEPA will determine cleanup objectives for clean closure.
- The facility must obtain necessary permits for waste disposal prior to excavation.
- All hazardous wastes which result from closure activities must be noted in the facility Annual Report.

On October 17, 1990, Bill Cook, Counselor Company, addressed a letter to Robert Wengrow, IEPA, concerning the forty (40) cubic yards of soil which had been excavated from the Alley Storage Area (SWMU 2.) He stated that David Retzlaff and Tracy Fitzgerald, IEPA, had informed Counselor that this excavated soil should be classified as hazardous material based on

trace amounts of an "F" listed substance. Counselor requested a thirty (30) day extension in order to acquire the necessary permits and properly dispose of the soil.

On October 22, 1990 Bill Cook, Counselor Company, addressed a letter to Michael McCabe, IEPA, stating that the forty (40) cubic yards of soil which had been excavated from the Alley Storage Area (SWMU 2) was being stored in plastic lined, covered rolloff boxes.

On October 22, 1990, Peter Schultz, Counselor Company, addressed a letter to Lawrence Eastep, IEPA, in response to the comments concerning the Alley Storage Area (SWMU 2) in the October 3, 1990 IEPA letter. Counselor stated that the concentrations of substances found in this unit's soil were below the action levels for these substances set by the U.S. EPA. For this reason, Counselor believes no further work is required for this unit. Counselor further states that the excavated soil should not be treated as a hazardous waste because of its origin (test excavation) and because it does not contain a RCRA listed waste above health-based levels.

The 1991 IEPA Hazardous Waste Report (dated February 26, 1992) states that Counselor Company generated the following wastes:

- paint still bottom (F003, F005); 1,820 gallons; transported off-site by Environmental Waste Resources, Inc.
- degreaser still bottom, 1,1,1-trichloroethane; 1,760 gallons; transported off-site by Environmental Waste Resources, Inc.
- waste glue, MIBK, toluene; 110 gallons; transported off-site by Environmental Waste Resources, Inc.
- waste 1,1,1-thrichloroethane; 3,575 gallons; transported off-site by Petro-Chem Processing, Inc.
- paint strip sludge; 275 gallons; transported off-site by Clean Harbors of Braintree, Inc.

On January 22, 1991, John Karrow, Environment Inc., acting for Counselor Company, addressed a letter to Lawrence Eastep, IEPA, containing certification for closure of the Outdoor Waste Paint and Solvent Storage Area (SWMU 1) and a summary report of cleanup activities for the Alley Storage Area (SWMU 2.)

On January 30, 1991, Luther Landon of Regulatory Compliance Associates addressed a letter to Charles Zeal, IEPA, in which he submitted the analysis results of Phase I soil sampling of the Outdoor Waste Paint and Solvent Storage Area (SWMU 1.) The samples were analyzed for volatiles, semi-volatiles and metals, with methylene chloride (5,328 ppb), di-n-butyl phtalate (4,412.2 ppb) and selenium (1.9 ppm) being the highest detected for each category. More soil sample analysis results for Outdoor Waste Paint and Solvent Storage Area (SWMU 1) were submitted in a February 27, 1991 letter addressed to Charles Zeal, IEPA, from Luther Landon, Regulatory Compliance Associates.

A March 15, 1991, IEPA Memorandum addressed to the Coordinated Permit Review Committee/Cleanup Objectives Team from Tracy Fitzgerald indicates that Counselor Company requested, in a March 7, 1991 facsimile message, that no semi-volatile sampling be continued in the remaining closure proceedings and consequently no clean-up objectives be set for semi-volatiles. Counselor based this request upon a statement that "[semi-volatiles] have no known use at this facility in any raw material or manufacturing process that could have conceivably resulted in...these compounds being incorporated into the hazardous waste stream managed in the [Outdoor Waste Paint and Solvent Storage Area (SWMU 1.)]" The memorandum indicates that a well lies within 500 feet of SWMU 1, hence Class I cleanup objectives would prevail.

A March 20, 1991, letter addressed to Peter Schultz, Counselor Company, from Lawrence Eastep, IEPA, states that "constituents which are found to be present in the analysis results will have cleanup objectives listed in a closure plan modification from the agency." IEPA indicated that analysis for the first round of sampling, which will include analysis for volatiles, semi-volatiles and metals, must be received by IEPA by July 1, 1991.

A May 3, 1991, IEPA Memorandum addressed to the Coordinated Permit Review Committee/Cleanup Objectives Team, from Tom McSwiggin, indicates that cleanup objectives for the Outdoor Waste Paint and Solvent Storage Area (SWMU 1) would be based on Class I standards for soil and groundwater.

On June 6, 1991, Lawrence Eastep, IEPA, addressed a letter to Peter Schultz, Counselor Company, indicating the following:

- IEPA has established cleanup objectives based on Class I standards for soil and groundwater of the Outdoor Waste Paint and Solvent Storage Area (SWMU 1.)
- Closure must be completed by December 15, 1991, and certification must be received by February 15, 1992.
- IEPA may amend the closure plan.

On August 29, 1991, Luther Landon, Regulatory Compliance Associates (RCA), addressed a letter to Charles Zeal, IEPA, indicating the following:

- RCA withdraws the request for the exclusion of semi-volatiles from sample analysis.
- RCA requests a thirty (30) day extension for further soil sampling.
- RCA requests a revision of cleanup objectives to Class II cleanup objectives.
- RCA and Counselor state, "[There are no private wells within the minimum setback zone of 500 feet from the area undergoing closure. Further, no inactive or active community water supply wells have been identified within 1,500 feet of the [Outdoor Waste Paint and Solvent Storage Area (SWMU 1.)]" They base this claim on the Inventory of Open Well Heads Rockford, a Physical Inventory, a Rockford Water Service Subscribers Inventory, and Water Well Records. They finish the argument with the statement that "Future development of wells in the area is improbable."

A November 15, 1991, IEPA Memorandum addressed to the Coordinated Permit Review Committee/Cleanup Objectives Team, from Michael Heaton, indicates that, on August 29, 1991, IEPA received a request from Counselor to change their cleanup objectives from Class I to Class II. The Memorandum indicates that there are three (3) wells within 500 feet of the facility and that these must be proven to be not in use in order to consider altering cleanup objectives. The Memorandum further indicates that chlorobenzene (177.9 ppb), dimethyl phthalate (1354 ppb) and pyridine (1133.04 ppb) had been detected in the soil of the Outdoor Waste Paint and Solvent Storage Area (SWMU 1) and that cleanup objectives had not been established for these constituents.

On November 1, 1991, Luther Landon of Regulatory Compliance Associates, addressed a letter to Charles Zeal, IEPA, in which he submitted a copy of the Revised Closure Plan. It was the same document as the September 30, 1991 Closure Plan with the addition of a minor revision to a sample location map.

On December 18, 1991, Lawrence Eastep, IEPA, addressed a letter to Peter Schultz, Counselor Company, indicating that:

- IEPA will not modify cleanup objectives for this facility because groundwater subject to Class I standards is located directly beneath the facility.
- The November 1, 1991, Closure Plan is approved subject to modification of the soil excavation and sampling actions.
- Closure activities must be completed by June 15, 1992, and certification must be received by August 15, 1992.

The 1992 IEPA Hazardous Waste Report (submitted February 26, 1993) states that the facility generated the following wastes:

- waste trichloroethane (F001, F002); 14,825 gallons; transported off-site by Petro-Chem Processing, Inc.
- waste trichloroethane (F002): 704 gallons; transported off-site by Ashland Chemical Company
- waste 1,1,1-trichloroethane (F002, F001): 2,794 gallons; transported off-site by Petro-Chem Processing, Inc.
- waste glue, MEK, ethyl acetate (F003, F005, D001): 45 gallons; transported off-site by Ashland Chemical.
- paint strip sludge (D002); 935 gallons; transported off-site by Ashland Chemical Company and Clean Harbors of Braintree, Inc.
- hazardous waste solid N.O.S. (F003, F005): 252,000 (unit is unclear); transported off-site by Marine Shale.
- waste flammable liquids (MBK, toluene, MEK, xylene) (F003, F005, D001); 1,965 gallons; transported off-site by Ashland Chemical Co.

On May 27, 1992, IEPA issued an Operating Permit No. 73050199, for the operation of a Paint Spray Operation to Counselor Company. The permit expired May 27, 1997.

On July 17, 1992, Luther Landon, Regulatory Compliance Associates (RCA), addressed a letter to James Moore, IEPA, reporting soil sampling activities which were implemented. Soil sample analysis "detected new compounds and have reported compounds above the established cleanup objectives." RCA requested a thirty (30) day extension "to submit a revised Sampling Plan [for the purpose of] determining the lateral and vertical extent of contamination."

According to a September 11, 1992 letter addressed to James Moore, IEPA, from Luther Landon, Regulatory Compliance Associates, several "hot spots" had been detected during soil sampling in the Outdoor Waste Paint and Solvent Storage Area (SWMU 1). The letter contained some revisions for the sampling plan to determine the vertical and horizontal extent of contamination.

On December 22, 1992, Lawrence Eastep, IEPA, addressed a letter to Peter Schultz, Counselor Company, indicating that IEPA approves the modifications to the soil sampling plan for the Outdoor Waste Paint and Solvent Storage Area (SWMU 1.). IEPA indicated that closure activities must be completed by June 1, 1993, and certification must be submitted by August 1, 1993.

The 1993 IEPA Hazardous Waste Report (submitted February 26, 1994) states that the facility generated the following wastes:

- waste, 1,1,1-trichloroethane, mixture (F001); 11,800 pounds; transported off-site by Ashland Chemical, Inc.
- waste, paint related material, flammable liquid (F003, D001, F005); 7,050 pounds; transported off-site by Rineco Chemical, Inc.
- waste caustic alkali liquids, N.O.S. (Potassium/sodium hydroxide) (D002, F003, F005); 220 gallons; transported off-site by Laidlaw Environmental Services of Illinois, Inc.
- waste flammable liquids, N.O.S. (Paint, xylene, toluene) (D001, F003, F005); 270 gallons; transported off-site by Laidlaw Environmental Services of Illinois, Inc.
- waste paint related material, corrosive material (D002); 11,700 pounds; transported off-site by Ashland Chemical
- hazardous waste, trichlorethane (F001); 4,640 gallons; transported off-site by Marine Shale Processors
- hazardous waste solid (ethylbenzene, xylene) (F003); 42,800 pounds; transported off-site by Marine Shale Processors
- hazardous waste solid, N.O.S., mineral spirits (D001); 55 pounds; transported off-site by Marine Shale Processors
- hazardous waste liquid, trichlorethane (F001); 4,640 gallons; transported off-site by Marine Shale Processors
- hazardous waste solid, N.O.S., toluene, ethylbenzene, xylene (F003, D001); 7,600 pounds; transported off-site by Marine Shale Processors
- hazardous waste solid, N.O.S., benzene, toluene, (F001, F003); 8,400 gallons; transported off-site by Marine Shale Processors
- hazardous waste solid, N.O.S., xylene, toluene, (F003, F005); 8,859 gallons; transported off-site by Wayne Disposal.

On September 17, 1993, Luther Landon, Regulatory Compliance Associates (RCA), addressed a letter to James Moore, IEPA, stating that "[confirmation sample data for the [Outdoor Waste Paint and Solvent Storage Area (SWMU 1)] pointed to the presence of several small areas of additional soil contamination in excess of the applicable [IEPA cleanup objectives.] Additional sampling was conducted to define the lateral and vertical extent of soil contamination associated with the presumed 'hot spots.' This investigation has resulted in the determination that approximately 40 tons of F-listed soil remains to be remediated." RCA indicates that they plan to excavate this soil and are waiting for confirmation from Counselor Company to determine the disposal method.

A December 20, 1993, letter addressed to Charles Shields, U.S. Department of Labor - OSHA, from Kenneth McGuffin, Counselor Company, petitions for an extension of an abatement date which was associated with item 2, citation 1 on Inspection 122100258. This citation involves an anhydrous ammonia tank which was to be removed from the property or purged by December 27, 1993. Counselor requests an extension of the abatement date to January 14, 1994.

A December 21, 1993, letter addressed to Charles Shields, U.S. Department of Labor - OSHA, from Jack Wholer, Counselor Company, indicates that the abatement on item 2, citation 1 was completed on December 20, 1993. Tanner Industries was contracted to pump out the ammonia tank, pull a vacuum, and disconnect the lines. The work receipt was attached to the letter, detailing that 325 gallons of ammonia were removed.

A September 15, 1993 letter addressed to Dennis Priewe, Rock River Water Reclamation District, from Luther Landon, Regulatory Compliance Associates, which indicated the following:

- Counselor Company div. Newell Company was acquired by Sunbeam-Oster Household Products (CC/SO) of Laurel Mississippi during late 1993.
- This transaction excluded the 2107 Kishwaukee Street real estate.
- On February 15, 1994, the manufacturing processes involving a washer line, caustic stripping tank, heat treating furnace, trichloroethylene degreaser, and several spray painting booths, were shut down for shipment to Mississippi, for sale to others or for demolition.
- Most of the existing hazardous materials inventory was shipped to the Sunbeam-Oster plant in Mississippi. The remaining inventory of hazardous waste materials was designated for disposal or for demolition. These materials and all hazardous waste generated during manufacturing operations and plant closure activities were shipped off-site for proper disposal during April 1994.
- As of April 30, 1994 the Illinois facility was vacated and the building lease expired on April 30, 1994. The Newell Company leased the entire facility to another entity for warehousing activities.
- RCA toured the facility and observed "...no indication of manufacturing operations being conducted at this location. No hazardous materials, beyond boiler maintenance chemicals and janitorial chemicals, were either used or stored on the premises."

An IEPA Division of Land Pollution Control Manifest File Search, dated June 19, 1995, indicated that Counselor Company did not generate any waste during 1994.

On December 9, 1994, Peter Schultz, Counselor Company, addressed a letter to Susan Davison, IEPA, in response to a Compliance Inquiry Letter dated November 30, 1994. Counselor requested that NPDES Permit No. IL0046850 (pertaining to an outfall for non-contact cooling water) be terminated as operations at the facility had ceased.

A January 1, 1995, IEPA-Division of Air Pollution Control Annual Emissions Report, completed by Peter Schultz, Newell Group, indicates that the following permits are no longer applicable to the 2107 Kishwaukee address, as the sources have been completely removed:

- Paint Spray Operator (permit number 73050199, expiring May 27, 1997)
- Heat Treat Degreaser (permit number 82100006, expiring June 1, 1997)
- Incinerator (permit number 82100009, expiring May 3, 1998.)

Two boilers remain at the facility (permit numbers 83110001 and 82100008.) The Annual Source Emissions which were noted on the report indicated the Counselor produced less than the IEPA Estimated Emissions for the facility and less than the IEPA Allowable Emissions in 1994.

On April 11, 1995, Thomas McSwiggin, IEPA, addressed a letter to Peter Schultz, Newell Company, indicating that IEPA has terminated the NPDES Permit No. IL0046850

On May 24, 1995, Baxter and Woodman Consulting Engineers, addressed a letter to Harry Chappel, IEPA, indicating that they have been retained by Newell Company to assist in the closure of the Outdoor Waste Paint and Solvent Storage Area (SWMU 1.) It is also indicated that remedial activities had been implemented (including excavation and disposal of contaminated soil) on SWMU 1, but poorly documented. No description of excavation boundaries or depths were found in IEPA or facility files. Baxter and Woodman request that the facility be given cleanup objectives for some compounds (which have no IEPA cleanup objectives) which have been detected per soil sampling analysis data. They also request a meeting with IEPA to determine the extent of additional sampling required.

According to a July 19, 1995, IEPA document titled, Counselor Company, written by Mike Heaton, IEPA, the cleanup objectives (CUO) for the Outdoor Waste Paint and Solvent Storage Area (SWMU 1) have been revised and are higher than the old CUOs. A set of notes which were attached to these, titled Counselor Company Review Notes, also written by Mike Heaton, indicate that Baxter and Woodman assume that all contaminated soil was removed (there is a mention of 120 cubic yards which was manifested off-site, it is unclear where this soil came from.) During a meeting involving Newell Company and Baxter and Woodman it was decided that the best course of action was to assume that all contamination had been removed but to collect confirmatory soil samples from the Outdoor Waste Paint and Solvent Storage Area (SWMU 1.)

On July 17, 1995, Edwin Bakowski, IEPA, addressed a letter to Peter Schultz of Newell Company, in response to the May 24, 1995, Baxter and Woodman letter. IEPA indicated that the proposed sampling plan (closure plan modification request) was approved. IEPA informed Counselor that changes have been made to the baseline soil cleanup objectives currently used for RCRA closure projects. Hence, the new cleanup objectives for the Outdoor Waste Paint and Solvent Storage Area (SWMU 1) are significantly lower.

On September 29, 1995 Steven Zehner, of Baxter and Woodman, addressed a letter to Edwin Bakowski, IEPA, in which an amended Work/Closure Plan was submitted, per a September 19, 1995 meeting with Mike Heaton, IEPA. The Plan states that six (6) confirmatory soil samples would be taken in locations determined by IEPA at depths six (6) to twelve (12) inches. Analysis was to be performed by National Environmental Testing, Inc. This Work/Closure Plan was approved by IEPA in a November 17, 1995 letter addressed to Peter Schultz, Newell Company, from Edwin Bakowski, IEPA. Closure activities were to be completed by May 31, 1996 and certification was to be submitted by July 31, 1996.

A March 12, 1996 letter addressed to Edwin Bakowski, IEPA, from Raymond Seitz, Baxter and Woodman, contained a request for a 45 day extension to submit the Closure Documentation Report and Closure Certification Statement to the IEPA.

On April 18, 1996, Edwin Bakowski, IEPA, addressed a letter to Peter Schultz, Newell Company, in response to a document submitted on Counselor's behalf by Baxter and Woodman on February 22, 1996 which contained the results of six (6) soil samples taken from the Outdoor Waste Paint and Solvent Storage Area (SWMU 1) (this document was not found in the file.) IEPA indicated that three (3) more samples should be collected "in an effort to determine if the accedences of cadmium and lead at three locations may be typical "background" values for the Rockford Region and also to compare the values to the document entitled "Tiered Approach to Cleanup Objectives, January 1996 (TACO.)" Upon receipt of sample analysis, IEPA would determine if further remediation action is needed.

On August 20, 1996, Edwin Bakowski, IEPA, addressed a letter to Peter Schultz, Newell Company, in response to a document dated July 16, 1996, containing the three soil sample analysis results requested by IEPA (this document was not found in the file.) IEPA treated the July 16, 1996 submittal as a closure plan modification request and approved it, subject to the following conditions:

- The lead levels around sample location SS04 (Figure 9) are elevated. Soil in a five (5) foot radius around this location should be excavated and disposed of off-site as a non-hazardous special waste.
- Further remediation (soil sampling, removal, backfilling and/or final cover placement) may be required.
- Closure activities must be completed by October 15, 1996, and certification must be received by IEPA by December 15, 1996.

On December 12, 1996, Raymond Seitz, of Baxter and Woodman, addressed a letter to Edwin Bakowski, IEPA which contained the following information concerning the Outdoor Waste Paint and Solvent Storage Area (SWMU 1) cleanup:

- "On October 9, 1996, Laidlaw Environmental Services of Illinois, Inc., excavated soils in the area of soil sample location SS04."
- Soils were excavated in the space contained in a five (5) foot perimeter of the sample location and two (2) feet deep.
- Special Waste Manifest Form Number IL7278682 documented the disposal of this soil (the soil was disposed of in Rosemount, Minnesota.)
- The excavated area was filled with ten (10) tons of crushed stone, another three (3) tons of stone were spread around the adjacent area.
- Counselor Company and Baxter and Woodman propose no further action.

On January 29, 1997, Edwin Bakowski, IEPA, addressed a letter to Peter Schultz, Newell Company, in response to the December 12, 1996 submittal. IEPA states that no further remediation efforts are needed and that the facility should submit closure certification for the Outdoor Waste Paint and Solvent Storage Area (SWMU 1.)

On August 15, 1997, Edwin Bakowski, IEPA addressed a letter to Peter Schultz, Counselor Company, indicating that upon receipt of the closure certification and visual inspection by an IEPA representative on July 16, 1997, the IEPA has determined that closure of the Outdoor Waste Paint and Solvent Storage Area (SWMU 1) is complete.

Environmental Setting

The Counselor Company facility is located in southwest Rockford, an area of moderate relief, low hills and river valleys. According to the November 1, 1991, Revised Work Plan for Closure of a Hazardous Waste Storage Area prepared by Regulatory Compliance Associates, the property is at 42 degrees 14 minutes 45 seconds, North Latitude and 89 degrees 05 minutes 15 seconds, West Longitude.

The land use adjacent to the Counselor Company facility is primarily residential to the east and is heavily industrialized to the west, north and south. The facility lies approximately one-half (0.5) mile south of a stream, and one-half (0.5) mile east of a city park. The Rock River lies approximately one (1) mile east of the facility. According to Bob Nimmo and Dave Sanquist, of the City of Rockford, Illinois Water Division, the Rock River is not used for drinking water but is designated for recreation and agriculture purposes. FEMA National Flood Insurance Program Panel No. 170723-0020-B, dated June 18, 1982, indicates the facility does not lie within the 100-year flood plain.

According to the 1963 Rainfall Frequency Atlas of the United States, Technical Paper No. 40, and the 1968 Climatic Atlas of the United States, both produced by the U.S. Department of Commerce, the normal annual total precipitation for the Rockford area is thirty-two (32) inches, the one year twenty-four (24) hour rainfall value is two and a half (2.5) inches, and the net precipitation is two (2) inches.

According to the 1984 Illinois Dept. of Energy and Natural Resources: State Geological Survey Division publication, *Geology for Planning in Boone and Winnebago Counties.*, Berg, R.C., Kempton, J.P. and Stecyk, A.N., Circular 531, and February 15, 1989 IEPA Closure Modification Notes written by Amy Dragovich, this facility is underlain by unconsolidated glacial sediments which are, in turn, underlain by sandstone bedrock with some carbonates. The glacial sediments fill the Rock River valley up to a depth of 250 feet and consist of alternating layers of sand/gravel and lacustrine sand, silt and clay. Boring logs for a municipal supply well near the site indicates that the underlying sandstone bedrock extends as deep as 1,500 feet below grade, the boring completion depth.

According to Bob Nimmo and Dave Sanquist, of the City of Rockford, Illinois Water Division, there are two aquifers present beneath the Counselor Company facility. The more shallow aquifer is an unconfined, unconsolidated sand and gravel aquifer which extends as deep as 250 feet in some areas. The deep aquifer is confined Mt. Simon sandstone which extends to approximately 1,500 feet. The groundwater table is fifteen (15) to twenty-five (25) feet below grade.

To determine the location of groundwater wells in the vicinity of the facility, an information request was submitted to the Illinois State Water Survey (ISWS) which maintains databases for all registered private groundwater wells and all registered public, industrial, and commercial wells known as PICS wells. In the State of Illinois, groundwater wells with less than 25 users or with yields of less than 75 gallons per minute are registered as private wells, while wells with greater than 25 users or with yields of greater than 75 gallons per minute are registered as PICS wells.

The ISWS information request identified over 25 PICS wells within one-mile of the facility which are currently registered as being in-use and which are drilled to depths between 150 to 1,140 feet. The ISWS information request identified eight (8), private, domestic-use wells within one-half mile of the facility which were installed between the years of 1970 and 1991 and are currently in use. Additional private wells are within a one mile radius of the facility. This information suggests that the groundwater within at least one-half mile of the facility is being used for industrial and commercial uses.

According to Bob Nimmo and Dave Sanquist, of the City of Rockford, Illinois Water Division, groundwater contamination (which may be a result of past industrial operations) is present throughout much of the Rockford area. As a result of this contamination several wells have been taken out of service and other wells have had treatment systems installed.

Release History

According to the August 1990 Closure Plan prepared by Fehr-Graham and Associates, on April 16, 1990, six (6) soil samples were taken at the Outdoor Waste Paint and Solvent Storage Area (SWMU 1), at a depth of two (2) feet. Several contaminants were detected, including 1,1,1-trichloroethane (140 ng/g.) The analytical reports are displayed on Data Sheets 3, 4, and 5, Appendix D, and sample locations are indicated on Figure 3, Appendix D.

According to the November 1, 1991 Revised Work Plan for Closure of a Hazardous Waste Storage Area prepared by Regulatory Compliance Associates, a second series of soil sampling was performed for SWMU 1 in early 1991. The sample locations are displayed in Figure 6, Appendix D, and analysis results are summarized in Table 2, Appendix D. Several contaminants were detected, including methylene chloride (5328 ppb.)

A third series of soil samples were performed for SWMU 1 in March 1991 and a fourth set was performed in July 1991. The locations of these soil samples are also displayed in Figure 6, Appendix D, and a summary of the analysis reports is presented in Tables 3 and 4, Appendix D. Several chemicals were detected including Di-n-butyl phthalate (4412.2 ppb) and lead (0.57 ppm.)

The November 1, 1991, Revised Work Plan characterizes the contamination of the Outdoor Waste Paint and Solvent Storage Area (SWMU 1) (based on these soil sampling results) as confined to the zone zero (0) to two (2) feet in depth beneath the storage unit.

A July 17, 1992, Regulatory Compliance Associates letter addressed to IEPA contained confirmatory soil sample results for the Outdoor Waste Paint and Solvent Storage Area (SWMU 1). The locations of confirmatory soil samples are indicated in Figure 7, sample numbers taken at locations are presented in Table 7, and positive (detect) soil sample analysis results are summarized in Tables 5 and 6. Two letters addressed to IEPA from Regulatory Compliance Associates, dated September 11, 1992 and September 17, 1993, discuss "hot spots" of contamination which were detected after confirmatory soil sample analysis. A Map (Figure 8, Appendix D) was found detailing areas of excavation around these "hot spots" however there is no documentation of this excavation.

An October 6, 1995, Baxter and Woodman letter addressed to IEPA, states that six (6) soil samples (whose locations were agreed upon by IEPA) would be taken in the Outdoor Waste Paint and Solvent Storage Area (SWMU 1) at a depth of six (6) to twelve (12) inches. This sampling was performed (documentation was not found in the file) and one sample location found high levels of lead.

According to the May 1990 Closure Plan submitted by Fehr-Graham and Associates, two (2) soil samples were taken from the Alley Storage Area (SWMU 2) on April 16, 1990. Sample locations are displayed in Figure 2, Appendix D, and analysis results are presented on Data Sheet 2, Appendix D. Tetrachloroethene, 1,1,1-trichloroethane (89,000 ng/g), and 1,1-dichloroethene were detected.

According to an August 22, 1990 letter addressed to David Retzlaff from Peter Schultz of Counselor Company, Environment, Inc. of Harvey, Illinois, was retained to perform a test excavation and appropriate sampling/analysis of the Alley Storage Area (SWMU 2) to describe the nature and extent of soil contamination within this SWMU. Thirty (30) cubic yards of soil were excavated on July 18, 1990. Six (6) post-evacuation samples were taken from the bottom of the excavation pit and were sent to DTC Laboratories, Inc. The analysis results reportedly indicated small areas of localized contamination by a chlorinated solvent (these test results were not found in the file.)

Further excavation was performed on July 31, 1990 by Environment, Inc. Twelve (12) cubic yards of soil were removed from SWMU 2 and six (6) post evaluation samples were taken from the pit. The sample locations are displayed in Figure 5, Appendix D, and analysis results are presented on Data Sheets 6, 7 and 8, Appendix D. All sample results indicate no detection for organic compounds.

An April 30, 1990, IEPA-Division of Land Pollution Control RCRA Inspection Report, indicates that staining was observed on the gravel of the Unknown and Waste Oil Drum Storage Area (SWMU 5) after drums were removed (see Photograph IEPA-13.) No soil sampling has been performed at this SWMU.

III. SOLID WASTE MANAGEMENT UNITS

This section presents descriptions of the solid waste management units (SWMUs) identified during the PA and VSI at the Counselor Company facility. Photograph numbers correspond to those presented in the Photograph Log in Appendix A.

Table 1
Solid Waste Management Units
Counselor Company
Rockford, Illinois

SWMU/AOC	Description	Release Potential
SWMU 1	Outdoor Waste Paint and Solvent Storage Area	High
SWMU 2	Alley Storage Area	High
SWMU 3	2,000 Gallon Waste Oil Underground Storage Tank	Low
SWMU 4	Satellite Accumulation Areas	Low
SWMU 5	Unknown and Waste Oil Drum Storage Area	Moderate
SWMU 6	Indoor Hazardous Waste Accumulation Area	Low
SWMU 7	Open Top Vapor Degreaser	Low

SWMU 1 - Outdoor Waste Paint and Solvent Storage Area

Photograph No(s): 1-1, 1-2

Period of Operation: Unknown to 1990

Location: This unit is located outdoors, along the north wall of the paint shed (see Figure 3, Appendix D.)

Physical Description: This unit consists of a gravel surface, approximately 132 feet by 20 feet area which was inadvertently used for the storage of drums containing waste. The topography of this area is flat, with no evidence of runoff routes.

Wastes Managed: According to the August 1990 Closure Plan prepared by Fehr-Graham and Associates, waste paint and solvents (F003-F005) containing the following chemicals were stored in this area:

- tetrachloroethene
- 1,1,1-trichloroethane
- trichloroethene
- toluene
- xylenes
- 1,1-dichloroethene
- cis-1,2-dichlororethene
- methyl ethyl ketone

After 1990 all waste managed in this unit was moved to the Indoor Hazardous Waste Accumulation Area (SWMU 6.)

History of Releases: According to the August 1990 Closure Plan prepared by Fehr-Graham and Associates, on April 16, 1990, six (6) soil samples were taken at this unit, at a depth of two (2) feet. Several chemicals were detected, including 1,1,1-trichloroethane (140 ng/g.) The analytical reports, are displayed on Data Sheets 3, 4, and 5, Appendix D, and sample locations are indicated on Figure 3, Appendix D.

According to the November 1, 1991 Revised Work Plan for Closure of a Hazardous Waste Storage Area prepared by Regulatory Compliance Associates, a second series of soil sampling was performed in early 1991. The sample locations are displayed in Figure 6, Appendix D, and analysis results are summarized in Table 2, Appendix D. Several chemicals were detected, including methylene chloride (5328 ppb.)

A third series of soil samples were performed in March 1991 and a fourth set was performed in July 1991. The locations of these soil samples are also displayed in Figure 6, Appendix D, and a

SWMU 1 - Outdoor Waste Paint and Solvent Storage Area (Continued)

summary of the analysis reports is presented in Table 3 and 4, Appendix D. Several chemicals were detected including Di-n-butyl phthalate (4412.2 ppb) and lead (0.57 ppm.)

The November 1, 1991, Revised Work Plan characterizes the contamination (based on these soil sampling results as confined to the zone zero (0) to two (2) feet in depth beneath the storage unit. This Work Plan expresses the intention of Counselor Company to excavate the contaminated soil and collect post excavation confirmatory soil samples. IEPA assumed this excavation was performed but no documentation of the excavation or disposal of excavated soil was found during the PA/VSI.

A July 17, 1992, Regulatory Compliance Associates letter addressed to IEPA contained confirmatory soil sample results. The locations of confirmatory soil samples are indicated in Figure 7, sample numbers taken at locations are presented in Table 7, and positive (detect) soil sample analysis results are summarized in Tables 5 and 6. Two letters addressed to IEPA from Regulatory Compliance Associates, dated September 11, 1992 and September 17, 1993, discuss "hot spots" of contamination which were detected after confirmatory soil sample analysis. A Map (Figure 8, Appendix D) was found detailing areas of excavation around these "hot spots" however there is no documentation of this excavation.

A September 29, 1995, Baxter and Woodman letter addressed to IEPA, states that 126 cubic yards of soil have been excavated from this unit. Due to poor documentation, the fate of this soil was not known. This letter also states that no confirmatory soil sampling was performed (in contrast to the discussion above) and details a new confirmatory soil sampling plan.

An October 6, 1995, Baxter and Woodman letter addressed to IEPA, states that six (6) soil samples (whose locations were agreed upon by IEPA) would be taken in the unit at a depth of six (6) to twelve (12) inches. This sampling was performed (documentation was not found in the file) and the results from one sample location indicated high levels of lead. IEPA suggested excavation of this area.

On December 12, 1996, Raymond Seitz, Baxter and Woodman, addressed a letter to Edwin Bakowski of IEPA containing details of the excavation. The excavation was performed on October 9, 1996 by Laidlaw Environmental Services of Illinois (LES), and the excavated area is indicated on Figure 9, Appendix D. A volume of soil approximately ten (10) feet in diameter and two (2) feet deep was removed. The soil was transported by LES to the LES facility (ILD982067175) in Pecatonica, Illinois, per Uniform Waste Manifest IL7278682. The excavated area was filled with ten (10) tons of crushed stone. another three (3) tons of stone were spread around the adjacent area.

An August 15, 1997 letter addressed to Peter Schultz, Newell Company, from Edwin Bakowski, IEPA, states that, after receipt of closure certification. IEPA considers this SWMU closed.

SWMU 1 - Outdoor Waste Paint and Solvent Storage Area (Continued)

Potential for Past/present Release:

High (X)
Moderate ( )
Low ( )

Conclusions: As is stated above, the IEPA took corrective action to address releases, and remediation was deemed adequate. No further actions are recommended.

SWMU 2 - Alley Storage Area

Photograph No(s).:. 1-3

Period of Operation: Unknown to 1990

Location: This unit is located outdoors along the north wall of the southern (main) building, to the northeast of the heat treating department.

Physical Description: This unit consists of a ten (10) feet by twenty-eight (28) feet area covered with cement. The cement has many areas of exposed soil.

Wastes Managed: This unit managed a container of scrap metal, degreaser still bottoms, and waste oil. After 1990 all waste managed in this unit (excluding the container of scrap metal) was moved to the Indoor Hazardous Waste Accumulation Area (SWMU 6.)

History of Releases: According to the May 1990 Closure Plan submitted by Fehr-Graham and Associates, two (2) soil samples were taken on April 16, 1990. Sample locations are displayed in Figure 2, Appendix D, and analysis results are presented on Data Sheet 2, Appendix D. Tetrachloroethene, 1,1,1-trichloroethane (89,000 ng/g), and 1,1-dichloroethene were detected.

According to an August 22, 1990 letter addressed to David Retzlaff from Peter Schultz, Counselor Company, Environment, Inc. of Harvey, Illinois, was retained to perform a test excavation and appropriate sampling/analysis to describe the nature and extent of soil contamination within this SWMU. Thirty (30) cubic yards of soil were excavated on July 18, 1990. Six (6) post-evacuation samples were taken from the bottom of the excavation pit and were sent to DTC Laboratories, Inc. The analysis results reportedly indicated small areas of localized contamination by a chlorinated solvent (these test results were not found in the file.)

Further excavation was performed on July 31, 1990 by Environment, Inc. Twelve (12) cubic yards of soil were removed and six (6) post evaluation samples were taken from the pit. The sample locations are displayed in Figure 5, Appendix D, and analysis results are presented on Data Sheets 6, 7 and 8, Appendix D. All sample results indicate no detection for organic compounds.

According to a January 22, 1991 Closure Documentation Report, the excavated soil was stored in five (5) eight yard long lugger boxes lined with polyethylene, until November 14, 1990, when it was transported off-site. According to Uniform Hazardous Waste Manifests IL4335595 and IL4335596, Fort Transfer (ILD062333752) transported the soil as a "Hazardous Waste Solid N.O.S. F001" to Envirosafe Services of Idaho (IDD073114654.)

SWMU 2 - Alley Storage Area (Continued)

Potential for Past/present Release:

High (X)
Moderate ( )
Low ( )

Conclusions: The facility performed a voluntary cleanup to address release and remediation was adequate. No further actions recommended.

SWMU 3 - 2,000 Waste Oil Underground Storage Tank

Photograph No(s).: No photograph

Period of Operation: Unknown to 1988

Location: This unit was located at the south wall of the north (storage) building.

Physical Description: This unit consisted of a five (5) foot, four (4) inch by twelve (12) foot, two (2) inch, 2,000 gallon steel tank.

According to a July 12, 1988, FIW, Inc. (FIW) Underground Storage Tank Removal Report (within the May 11, 1990 Closure Plan submitted by Fehr-Graham and Associates), FIW was contracted to clean and excavate this UST. This included certifying the tank as being clean and sampling the soil beneath the UST. The tank excavation was conducted by Northern Illinois Service Company on June 17, 1988. There were no observations concerning tank integrity in the Report. Prior to excavation, the remaining 2,000 gallon of waste oil was pumped out. After excavation a soil sample was taken at the north end and south end of the imprint, one and a half (1.5) feet below the bottom of the imprint. Soil samples were forwarded to National Environmental Testing, Inc. The analysis reports for are on Data Sheet 1, Appendix D. Analysis of the sample composite suggests there was no apparent contamination of the soil as no volatile compounds were detected (although the samples were not analyzed for petroleum hydrocarbons.)

The excavation was then backfilled with the excavated material and brought to grade with road stone. Cleaning of the UST included a high pressure wash with trisodium phosphate cleaner and was completed on June 17, 1988. The tank was transported off-site by Northern Illinois Service Company to be disposed of at Joseph Behr and Sons, a metal reycling facility. The 2,000 gallons of waste oil pumped out of the tank and the 100 gallons of wash water generated by cleaning activities were disposed of at Chem-Clear, Chicago, IL by FIW, Inc.

Wastes Managed: This unit managed waste oil.

History of Releases: Analysis of soil samples beneath this unit indicate no evidence of release.

Potential for Past/present Release:

High ( )
Moderate ( )
Low (X)

Conclusions: The facility performed excavation and sampling, a low potential for contamination was found. No actions are recommended.

SWMU 4- Satellite Accumulation Areas

Photograph No(s).: IEPA-4, IEPA-5, IEPA-6, IEPA-7, IEPA-8, IEPA-9, IEPA-10

Period of Operation: Approximately 1990 to 1994

Location: These areas were located throughout the facility, the following are the individual satellite accumulation areas, their locations and corresponding photograph:

- Waste Flammable Liquid Satellite Accumulation Area located on the second floor of the south (main) building in the paint department, within the booth on the north wall (Photograph Nos. IEPA-4, IEPA-5, IEPA-8.)
- Paint Filters and Glue Satellite Accumulation Area, located on the second floor of the south (main) building in the paint department, at the northwest corner (IEPA-6.)
- Solvent Soaked Rag Satellite Accumulation Area, located in the north (storage) building, at the southwest corner (IEPA-7.)
- Solvent Soaked Rag Satellite Accumulation Area, located on the second floor of the south (main) building in the paint department, in the west central floor area (IEPA-9.)
- The 1,1,1-Trichloroethane Still Bottoms Satellite Accumulation Area, is located on the first floor of the south (main) building in the heat treating room (IEPA-10.)

Physical Description: These areas consist of small areas of concrete which support drums containing waste. The Waste Flammable Liquid Satellite Accumulation Area consisted of open containers of waste (see Photo Nos. IEPA-4 and IEPA-5) until April 1990, when a covered 55 gallon drum was installed and open containers were removed (Photo No. IEPA-8.)

The Solvent Soaked Rag Satellite Areas in the north and south buildings, and the 1,1,1-Trichloroethane Still Bottoms Satellite Accumulation Area consist of one covered 55 gallon drum used to store waste. The Paint Filters and Glue Satellite Accumulation Area consists of two covered drums used to stored waste.

A January 30, 1990, IEPA-RCRA Inspection Report, indicated that the containers in the [Waste Flammable Liquid] Satellite Accumulation Area were unlabeled, in poor condition and were open. A March 30, 1990, IEPA-RCRA Inspection Report, indicated that the Paint Filters and Glue, two (2) Solvent Soaked Rag, and 1,1,1-Trichloroethane Still Bottoms Satellite Accumulation Areas had been established at the facility. The Report stated that "the containers in the satellite accumulation areas are kept closed and are properly labeled."

Wastes Managed: These areas managed the following wastes:

- waste flammable liquid
- paint filters and glue
- solvent soaked rags
- 1,1,1-trichloroethane still bottoms

SWMU 4- Satellite Accumulation Areas (Continued)

According to a September 15, 1994, Regulatory Compliance Association letter addressed to IEPA, waste managed in these areas was shipped off-site for proper disposal in April 1994.

History of Releases: No releases observed during PA/VSI.

Potential for Past/present Release:

High ( )
Moderate ( )
Low (X)

Conclusions: No further action recommended.

SWMU 5 - Unknown and Waste Oil Drum Storage Area

Photograph No(s): IEPA-11, IEPA-12, IEPA-13

Period of Operation: Unknown to 1990

Location: This unit is located behind the north (storage) building.

Physical Description: This unit consists of a outdoor gravel area on which drums were stored.

Wastes Managed: This unit managed fewer than fifty (50) drums containing waste oil and unknown materials. According to an April 30, 1990, IEPA-Division of Land Pollution Control RCRA Inspection Report, all waste was removed from this location in 1990 and moved to the Indoor Hazardous Waste Accumulation Area (SWMU 6.)

History of Releases: An April 30, 1990, IEPA-Division of Land Pollution Control RCRA Inspection Report, indicates that staining was observed on the gravel of this unit after drums were removed (see Photograph IEPA-13.) There is no record of IEPA action concerning this unit.

Potential for Past/present Release:

High ( )
Moderate (X)
Low ( )

Conclusions: Confirmatory soil sampling should be performed to determine if releases occurred.

SWMU 6 - Indoor Hazardous Waste Accumulation Area

Photograph No(s): IEPA-14, IEPA-15, IEPA-16, IEPA-17, IEPA-18, IEPA-19, IEPA-20, IEPA-21

Period of Operation: 1990 to 1994

Location: This unit is located inside the north building against the south wall.

Physical Description: This unit consists of an area of epoxy coated concrete floor, approximately thirty-five (35) feet by thirty (30) feet. The April 30, 1990, IEPA-Division of Land Pollution Control RCRA Inspection Report indicates that the area is surrounded on the north, east and south sides with a four (4) inch high angle iron berm (see Photo No. IEPA-21) which has been sealed to the floor. The west side of the area is sloped down towards the east to contain any spills. Figure 4, Appendix D, indicates the locations of various waste containing drums in the area. PA/VSI observations indicate that the floor was somewhat pitted.

Wastes Managed: This unit managed a variety of wastes including the following:

- waste paint
- quench oil still bottoms
- waste paint still bottoms
- oil dry
- glue
- floor sweepings
- paint filters
- heat treat waste oil
- paint still bottoms
- degreaser still bottoms
- paint room floor sweepings
- rags with solvent
- waste oil/solvent

According to a September 15, 1994, Regulatory Compliance Association letter addressed to IEPA, waste managed in this area was shipped off-site for proper disposal in April 1994.

History of Releases: No releases were observed during the PA/VSI.

Potential for Past/present Release:

High ( )
Moderate ( )
Low (X)

Conclusions: No actions recommended.

SWMU 7 - Open Top Vapor Degreaser

Photograph No(s): No photographs.

Period of Operation: 1982 to 1994.

Location: This unit was located inside the south (main) building in the heat treating department.

Physical Description: IEPA Operating Permits dated October 4, 1982 and June 9, 1987, indicate this unit was identified as a Blakeslee HL600 Open Top Vapor Degreaser, which was replaced in 1987 by a Blakeslee Degreaser 10685.

According to a September 15, 1994, Regulatory Compliance Association letter addressed to IEPA, the degreaser was shut down and sent to the Counselor Company, Sunbeam-Oyster facility in Mississippi. All remaining waste produced by this unit was shipped off-site for proper disposal in April 1994.

Wastes Managed: This unit used Chlorethene VG (96.5% 1,1,1-trichloroethane) for degreasing. Waste 1,1,1-trichloroethane still bottoms produced by this unit were stored in the Alley Storage Area (SWMU 2) until 1990. After 1990, this waste was stored in the Indoor Hazardous Waste Accumulation Area (SWMU 6.)

History of Releases: No releases were observed during PA/VSI.

Potential for Past/present Release:

High ( )
Moderate ( )
Low (X)

Conclusions: No actions recommended.

IV. CONCLUSIONS

Based on observations made during the VSI and analytical results of soil sampling conducted at the facility, further investigation under Corrective Action Authorities appears warranted for SWMU 5. It is recommended that the further actions under Corrective Action Authorities described below be coordinated with any IEPA or State of Illinois Office of Attorney General approved plans.

Further soil sampling is suggested at the following unit:

- Unknown and Waste Oil Drum Storage Area (SWMU 5.)

Soil sampling at the above unit is warranted because the unit possess a moderate potential for releases to soil.

V. REFERENCES

1. March 18, 1974 IEPA Air Pollution Episode Action Plan for the Brearley Company, John Brearley.

2. July 1, 1980 IEPA Division of Air Pollution Control, Open Top Vapor Degreaser Information Form.

3. November 1, 1983 IEPA Operating Permit for Boiler #54212, Bharat Mathur.

4. May 25, 1986 Generator ID Number Request Form for Greenlee Tool Co.

5. August 6, 1986, Pre-Enforcement Conference Letter addressed to Lyle Wade, Counselor Corporation, from Gregory Zak, IEPA.

6. September 15, 1986 IEPA Memorandum concerning a Compliance Inquiry Letter addressed to Greg Zak from Hope Wright.

7. September 15, 1986 IEPA Memorandum concerning a concerning permit addressed to Greg Zak from Hope Wright.

8. February 12, 1987, 1996 IEPA Generator Annual Hazardous Waste Report for Counselor Company, Rick Nelson.

9. June 9, 1987 Operating Permit for Blakeslee Degreaser VSV SN# 10685, Terry Sweitzer.

10. July 21, 1987 Compliance Inquiry Letter addressed to Counselor Corporation from Eugene Theios, IEPA.

11. July 28, 1987 Letter concerning violations addressed to Eugene Theios from Rick Nelson, Counselor Corporation.

12. July 30, 1987 Status of Violations Form, reviewer Hope Wright.

13. August 10, 1987 Letter addressed to Counselor Corporation from Linda Kissinger, IEPA.

14. April 27, 1988 Compliance Inquiry Letter addressed to Rick Nelson, Counselor Corporation, from Eugene Theios.

15. June 17, 1988 National Environmental Testing, Inc. Analytical Report, Toni Gartner, Manager.

16. August 15, 1988 Generator Standards Form, Revision 1, for Counselor Corporation.

17. September 28, 1988 Letter concerning Annual Report for Hazardous Waste Production 1987, addressed to Hope Wright, IEPA, from Rick Nelson, Counselor Corporation.

18. September 28, 1988 LPC Reference Sheet for Counselor Corporation.

19. January 30, 1989 IEPA Division of Water Pollution Control Report, Field Operations Section, C. Corley.

20. March 24, 1989 Compliance Inquiry Letter addressed to Counselor Corporation from Eugene Theios, IEPA.

21. March 31, 1989 Letter addressed to Michael Walwer, IEPA, from Edwin Hogan, Greenlee Tool, Textron.

22. April 19, 1989, 1987 IEPA Facility Annual Hazardous Waste Report for Counselor Company, Rick Nelson.

23. June 19, 1989 Letter concerning RCRA waste contaminated soil regulatory status, addressed to Thomas Jorling, New York Dept. of Environmental Conservation, from Jonathan Cannon, U.S. EPA Region 5.

24. July 20, 1989 Letter requesting information addressed to Susan Konzelmann, IEPA from Susan Brown, ERM-North Central, Inc.

25. August 4, 1989 Letter forwarding information concerning Greenlee Tool, addressed to Susan Brown, ERM-North Central, Inc. from Susan Konzelmann, IEPA.

26. January 30, 1990 RCRA Inspection Report and Post Inspection Remarks for Counselor Corporation, prepared by David Retzlaff, IEPA.

27. January 30, 1990 RCRA Land Disposal Inspection Checklist for Counselor Corporation, prepared by David Retzlaff, IEPA.

28. March 6, 1990, 1989 TSDR Facility Annual Hazardous Waste Report for Counselor Company, Rick Nelson.

29. March 14, 1990 Pre-Enforcement Conference Letter addressed to Rick Nelson, Counselor Corporation, from Harry Chappel, IEPA.

30. April 3, 1990 Letter concerning land disposal restrictions addressed to Rick Nelson, Counselor Corporation, from Paul Dimock, IEPA.

31. April 3, 1990 Letter concerning items discussed during April 2, 1990 conference, addressed to Michael Fraser, Counselor Corporation from David Retzlaff, IEPA.

32. April 18, 1990 IEPA Internal Notes concerning Counselor Corporation.

33. April 16 through 27, 1990 National Environmental Testing, Inc. Analytical Reports, Brian Wanner, Manager.

34. April 30, 1990 RCRA Inspection Report and Post Inspection Remarks for Counselor Corporation, prepared by David Retzlaff, IEPA.

35. May 11, 1990 Letter with Contingency Plan attached addressed to the Rockford Police Dept. from Michael Fraser, Counselor Corporation.

36. May 11, 1990 Letter concerning hazardous waste generation notification, addressed to the Rockford Fire Dept. from Michael Fraser, Counselor Corporation.

37. May 11, 1990 Letter with Closure Plan enclosed addressed to Lawrence Eastep, IEPA, from Fehr-Graham & Associates.

38. May 11, 1990 Letter concerning TSD Facility Annual Reports for 1989, 1988 and 1987, addressed to Hope Wright. IEPA from Mark Young, Fehr-Graham & Associates.

39. May 11, 1990, 1988 IEPA TSDR Facility Annual Hazardous Waste Report, Rick Nelson.

40. May 1990 Closure Plan prepared for Counselor Corporation by Fehr-Graham & Associates.

41. May 14, 1990 Letter confirming resolved violations addressed to Harry Chappel, IEPA from Michael Fraser, Counselor Corporation.

42. May 14, 1990 Closure Plan Review Notes and Checklist for Counselor Corporation.

43. May 17, 1990 Public Notice of Closure 90016, Closure No. C539

44. May 23, 1990 Letter concerning resolved violations addressed to Rick Nelson from Angela Tin, IEPA.

45. June 8, 1990 Letter concerning resolved violations addressed to Rick Nelson, Counselor Corporation from William Radlinski, IEPA.

46. June 8, 1990 Status of Violations Form completed by Dave Retzlaff, IEPA.

47. June 15, 1990 Letter concerning resolved violations addressed to Rick Nelson, Counselor Corporation from William Radlinski, IEPA.

48. July 26, 1990 through August 2, 1990 DTC Laboratories, Inc. Analytical Reports, Gerald Mack, Chief Scientist.

49. August 1990 Closure Plan prepared for Counselor Corporation by Fehr-Graham & Associates.

50. August 1, 1990 Letter addressing deficiencies in May 1990 Closure Plan addressed to Peter Schultz, Counselor Corporation, from Lawrence Eastep, IEPA.

51. August 2, 1990 DTC Laboratory, Inc. Analytical Reports, Gerald Mack, Chief Scientist.

52. August 22, 1990 Letter addressed to David Retzlaff. IEPA, from Peter Schultz, Newell, Counselor Corporation.

53. August 23, 1990 Map of Counselor Company First and Second Floor Plans, prepared by Fehr-Graham & Associates.

54. August 29, 1990 Letter concerning resubmission of August 1990 Closure Plan, addressed to Lawrence Eastep. IEPA, from Mark Young, Fehr-Graham & Associates.

55. August 31, 1990 Closure Plan Review Notes and Checklist for Counselor Company.

56. September 25, 1990 IEPA Counselor Company Closure Plan Notes.

57. October 3, 1990 Letter containing closure plan approval addressed to Peter Schultz, Counselor Company from Lawrence Eastep. IEPA.

58. October 17, 1990 Letter concerning voluntary clean-up addressed to Robert Wengrow from Bill Cook, Counselor Company.

59. October 22, 1990 Letter responding to closure plan modifications addressed to Lawrence Eastep, IEPA from Peter Schultz, Newell. Counselor Company.

60. October 22, 1990 Letter addressed to Michael McCabe, IEPA, from Bill Cook, Counselor Company.

61. November 20, 1990 Uniform Hazardous Waste Manifest Document Number 4335595 for Counselor Corporation.

62. November 20, 1990 Uniform Hazardous Waste Manifest Document Number 4335596 for Counselor Corporation.

63. October 3, 1990 Letter containing closure plan approval addressed to Peter Schultz, Counselor Company, from Lawrence Eastep, IEPA.

64. 1991 IEPA Hazardous Waste Report for Counselor Company.

65. January 14, 1991 IEPA Notes on Counselor Company.

66. January 22, 1991 Letter containing final Closure Certification report, addressed to Lawrence Eastep, IEPA, from John Karrow, Environment, Inc.

67. January 23, 1991 IEPA Memorandum including inspection findings, addressed to M.A. Zamco from R. Jennings/T. Walsh.

68. January 29, 1991 Letter enclosing copies of correspondence addressed to Lawrence Eastep, IEPA, from Peter Schultz, Newell Corporation.

69. January 30, 1991 Letter containing results of Phase I sampling addressed to Charles Zeal, IEPA, from Luther Landon, Regulatory Compliance Associates.

70. February 27, 1991 Letter requesting a modification of Closure Plan addressed to Charles Zeal, IEPA from Luther Landon, Regulatory Compliance Associates.

71. March 4, 1991, 1990 IEPA Generator Annual Hazardous Waste Report, Bill Cook.

72. March 15, 1991 IEPA Memorandum addressed to Coordinated Permit Review Committee/Cleanup Objective Team from Tracy Fitzgerald.

73. March 20, 1991 Letter requesting a thirty day extension for soil sampling results addressed to Peter Schultz, from Lawrence Eastep, IEPA.

74. April 5, 1991 LNS Environmental Services, Inc. Analytical Reports, Niranjan Shah.

75. April 18, 1991 Request for Cleanup Objectives Review, Lawrence Eastep, IEPA.

76. May 3, 1991 IEPA Memorandum addressed to Coordinated Permit Review Committee/Cleanup Objectives Team from Tom McSwiggin.

77. May 22, 1991 IEPA Memorandum addressed to Coordinated Permit Review Committee from Tom McSwiggin.

78. June 6, 1991 Letter concerning analytical results addressed to Peter Schultz from Lawrence Eastep, IEPA.

79. July 17, 1991 Letter containing sampling analysis results, addressed to James Moore from Luther Landon, Regulatory Compliance Associates.

80. August 29, 1991 Letter concerning closure including water well records, addressed to Charles Zeal, IEPA, from Luther Landon, Regulatory Compliance Associates.

81. November 1, 1991 Letter enclosing a revised Closure Plan, addressed to Charles Zeal, IEPA from Luther Landon, Regulatory Compliance Associates.

82. November 1, 1991 Revised Work Plan for the Closure of the Hazardous Waste Storage Area prepared for Counselor Company, by Regulatory Compliance Associates.

83. November 15, 1991 IEPA Memorandum concerning a request for Clean-up Objectives Change addressed to Coordinated Permit Review Committee/Cleanup Objectives Team from Michael Heaton.

84. December 1, 1991 letter concerning Illinois' Clean Air Act Permit Program addressed to Mark Frederick, Counselor Company, from Donald Sutton, IEPA.

85. December 9, 1991 IEPA Notes concerning Counselor Closure, by Michael Heaton.

86. December 18, 1991 Letter addressed to Peter Schultz, Counselor Company fro Lawrence Eastep, IEPA.

87. December 19, 1991 IEPA Memorandum concerning December 13, 1991 inspection, addressed to M.A. Zamco from R. Jennings/T. Walsh.

88. February 26, 1992, 1991 IEPA Hazardous Waste Report for Counselor Company, Bill Cook.

89. March 26, 1992 IEPA Operating Permit for Paint Spray Operation.

90. June 5, 1992 Analytical Laboratory Service Analytical Reports, Pamela Feisher, Analytical Chemist.

91. July 31, 1992 IEPA Division of Land Pollution Control, 1991 Annual Report Error Listing.

92. September 11, 1992 Letter outlining revisions in sample plan addressed to James Moore, IEPA, from Luther Landon, Regulatory Compliance Associates.

93. October 4, 1992 Operating Permit for Blakeslee Open Top Degreaser, Bharat Mathur.

94. December 1992 IEPA Notes concerning Counselor Closure C-539-M-5, by Mike Heaton.

95. December 22, 1992 Letter concerning modification request addressed to Peter Schultz, Counselor Company, from Lawrence Eastep, IEPA.

96. February 26, 1993, 1992 IEPA Hazardous Waste Report for Counselor Company, Luther Landon.

97. May 4, 1993 1992 IEPA Hazardous Waste Report for Counselor Company, Luther Landon, Counselor Company.

98. September 17, 1993 Letter concerning sample analysis results addressed to James Moore, IEPA, from Luther Landon, Regulatory Compliance Associates.

99. December 20, 1993 Letter requesting extension of abatement date addressed to Charles Shields, OSHA, from Kenneth L. McGruffin, Counselor Company.

100. February 26, 1994 IEPA 1993 Hazardous Waste Report for Counselor Company, Kenneth McGriffin.

101. September 15, 1994 Letter concerning aquistion of Counselor Company addressed to Dennis Priewe from Luther Landon, Regulatory Compliance Associates.

102. December 9, 1994 Letter discussing Couselor Company permit termination, addressed to Susan Davison, IEPA, from Peter Schultz, Newell Company.

103. Januray 5, 1995 IEPA Annual Emissions Report 1994 for Couselor Company, Peter Schultz.

104. May 24, 1995 Letter concerning Counselor Closure, addressed to Harry Chappel, IEPA, from Baxter & Woodman.

105. June 20, 1995, 1994 IEPA Hazardous Waste Report Form IC-Identification and Certification for Counselor Company.

106. July 19, 1995 IEPA Review Notes of Couselor Company written by Mike Heaton.

107. July 27, 1995 Letter approving proposed closure plan modification adressed to Peter Schultz, Newell Co., from Edwin Bakowski, IEPA.

108. September 29, 1995 Letter concerning work plan for closure, addressed to Edwin Bakowski, IEPA from Teven Zehner, Baxter & Woodman.

109. November 17, 1995 Letter approving closure modification requests, addressed to Peter Schultz, Newell Company, from Edwin Bakowski, IEPA.

110. March 12, 1996 Letter requesting extension for Closure Documentation Report, addressed to Edwin Bakowski, from Raymond Seitz, Baxter & Woodman.

111. April 18, 1996 Letter directing more soil sampling, addressed to Peter Shultz, Newell Company, from Edwin Bakowski, IEPA.

112. July 22, 1996 Document titled "Introduction to Project" concerning Counselor Company.

113. August 20, 1996 Letter approving closure plan modification addressed to Peter Schultz, Newell Company, from Edwin Bakowski. IEPA.

114. October 9, 1996 State of Illinois Uniform Hazardous Waste Manifest Document Number 7278682.

115. October 11, 1996 National Environmental Testing Analytical and Quality Control Reports, Mary Pearson, Project Manager.

116. December 12, 1996 Letter concerning closure addressed to Edwin Bakowski, from Raymond Seitz, Baxter & Woodman, Inc. Consulting Engineers.

117. January 29, 1997 Letter requesting the submission of closure certification, addressed to Peter Schultz, Newell Company, fom Edwin Bakowski, IEPA.

118. August 15, 1997 Letter stating closure of hazardous waste container storage area, addressed to Peter Schultz, Newell Company, from Edwin Bakowski, IEPA.

119. June 18, 1997 IEPA Memorandum concerning closure documentation report, addressed to Rockford FOS from William Sinnott II.

120. October 23, 1997 Facsimile Transition Sheet concerning VSI, adressed to Peter Schultz from Robert Young, TechLaw, Inc.

121. Undated, Draft of Environmental Disclosure Document for Transfer of Real Property, completed by Peter Schultz, Newell Company.

APPENDIX A
Visual Site Inspection Photograph Log

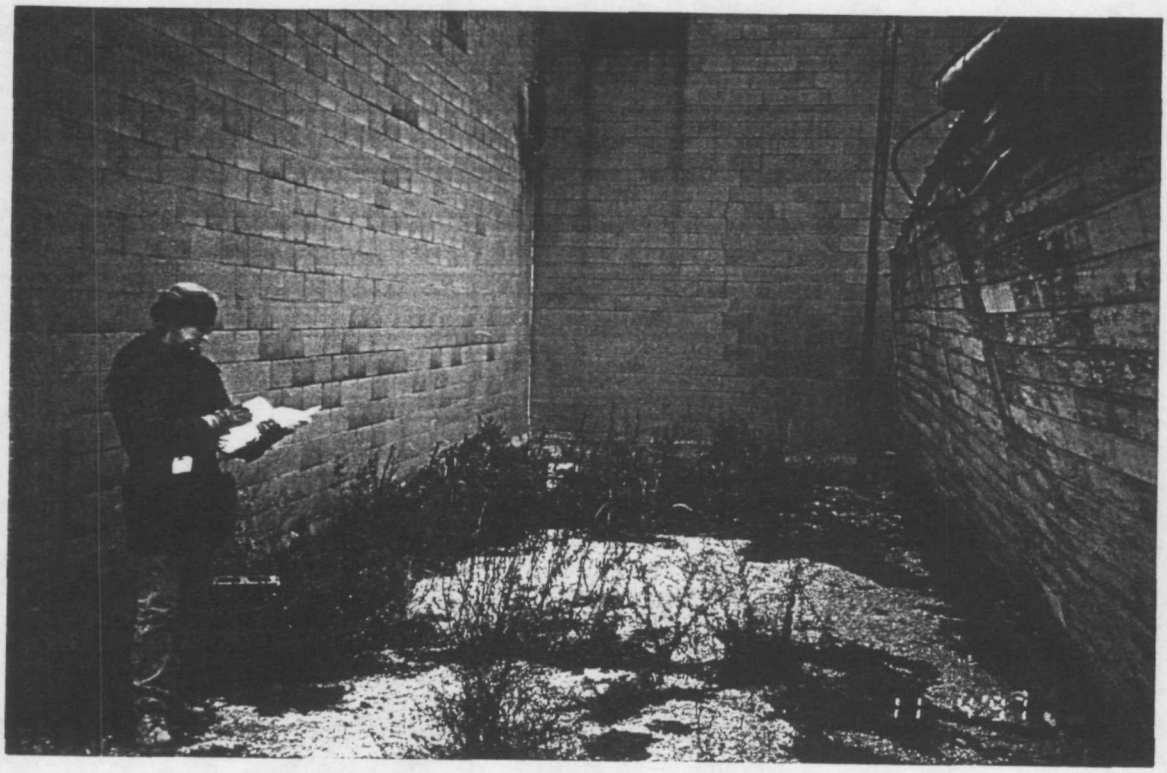


Photo No.: 1-1
Date: November 4, 1997

Time: 1300 - 1415
Direction: East

Description: View of the Outdoor Waste Paint and Solvent Storage Area (SWMU 1).

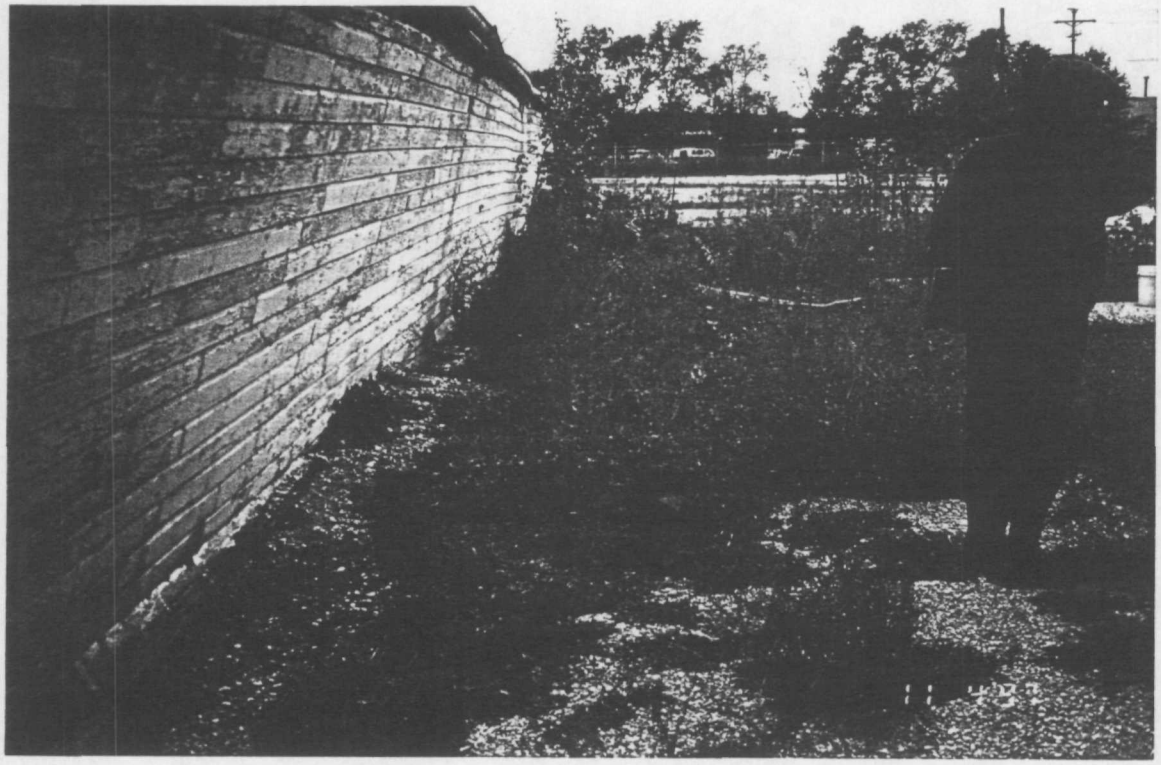


Photo No.: 1-2
Date: November 4, 1997

Time: 1300 - 1415
Direction: West

Description: View of the Outdoor Waste Paint and Solvent Storage Area (SWMU 1).

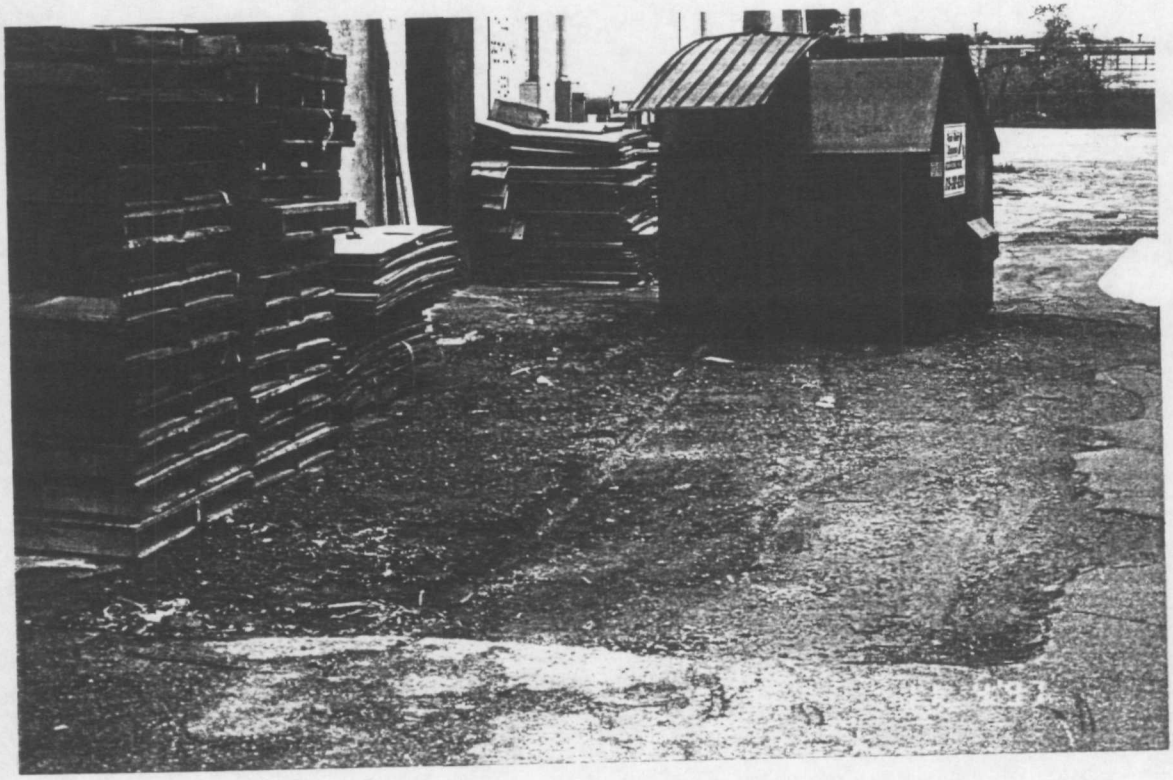


Photo No.: 1-3
Date: November 4, 1997

Time: 1300 - 1415
Direction: West

Description: View of the Alley Storage Area (SWMU 2), note exposed soil.

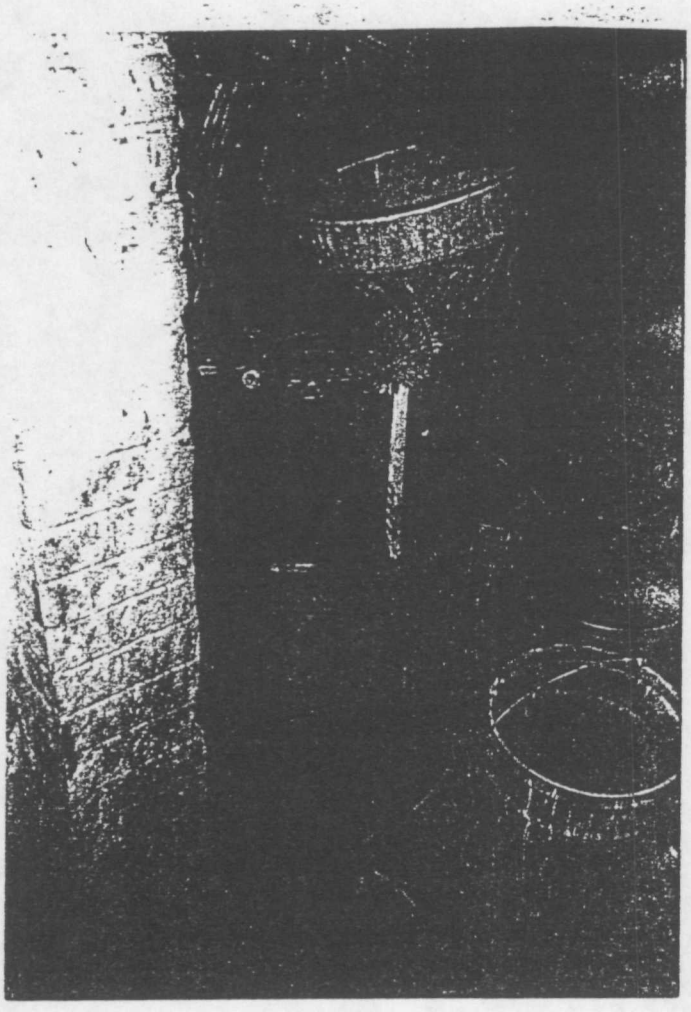


Photo No.: IEPA-4
Date: January 3, 1990

Time: 1218
Direction: Northwest

Description: Waste Flammable Liquid Satellite Accumulation Area (part of SWMU 4).

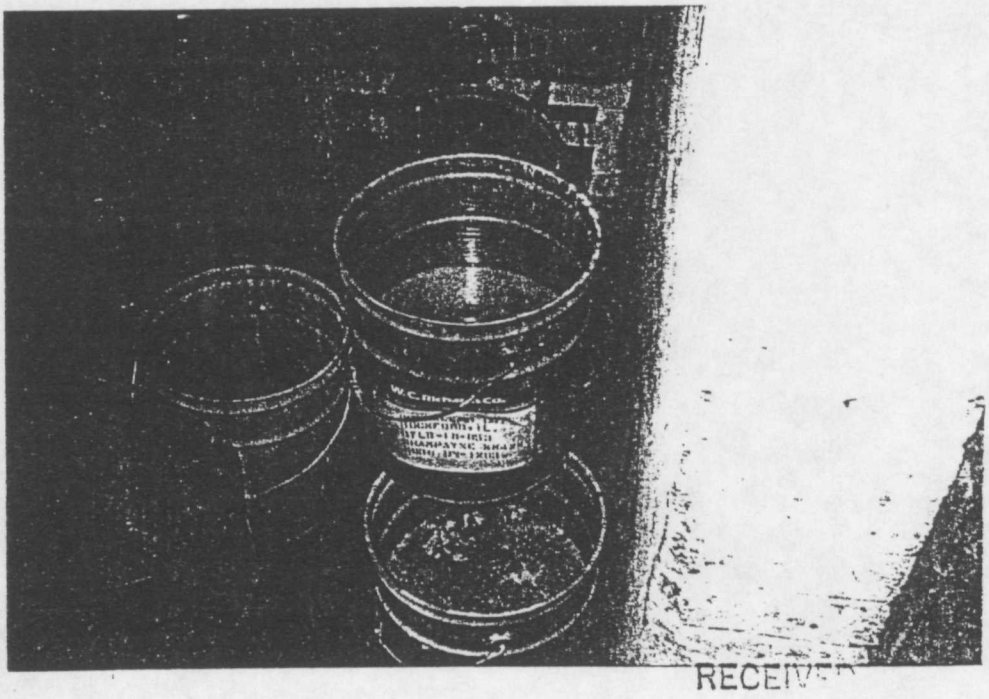


Photo No.: IEPA-5
Date: January 30, 1990

Time: 1218
Direction: East

Description: Waste Flammable Liquid Satellite Accumulation Area (part of SWMU 4).

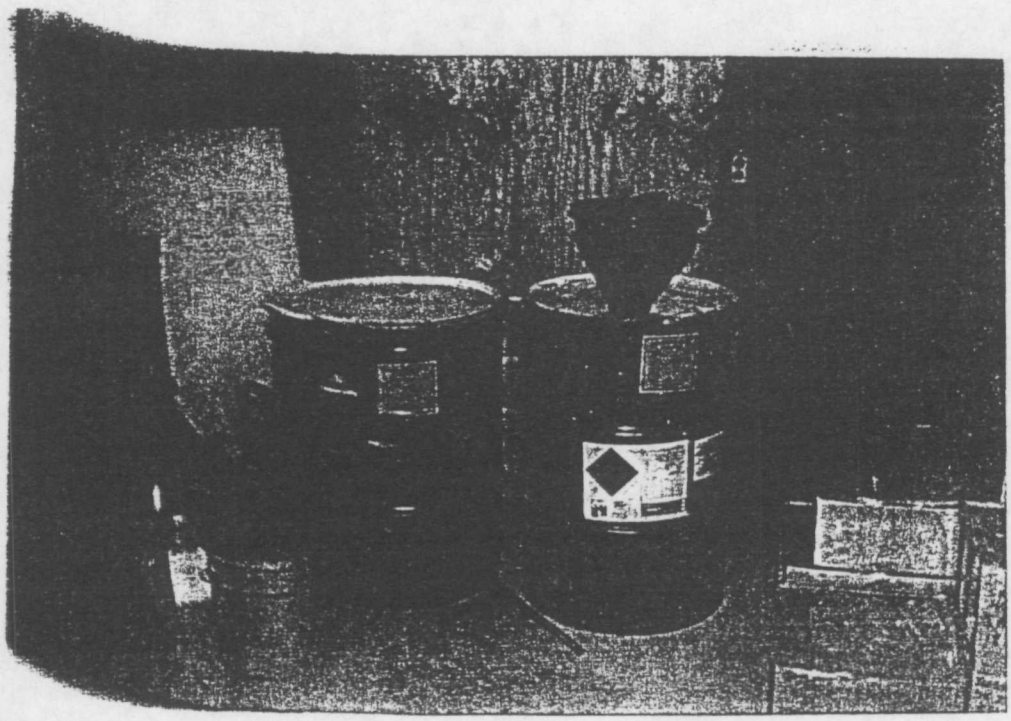


Photo No.: IEPA-6
Date: April 30, 1990

Time: Unknown
Direction: West

Description: Paint Filters and Glue Satellite Accumulation Area (part of SWMU 4).

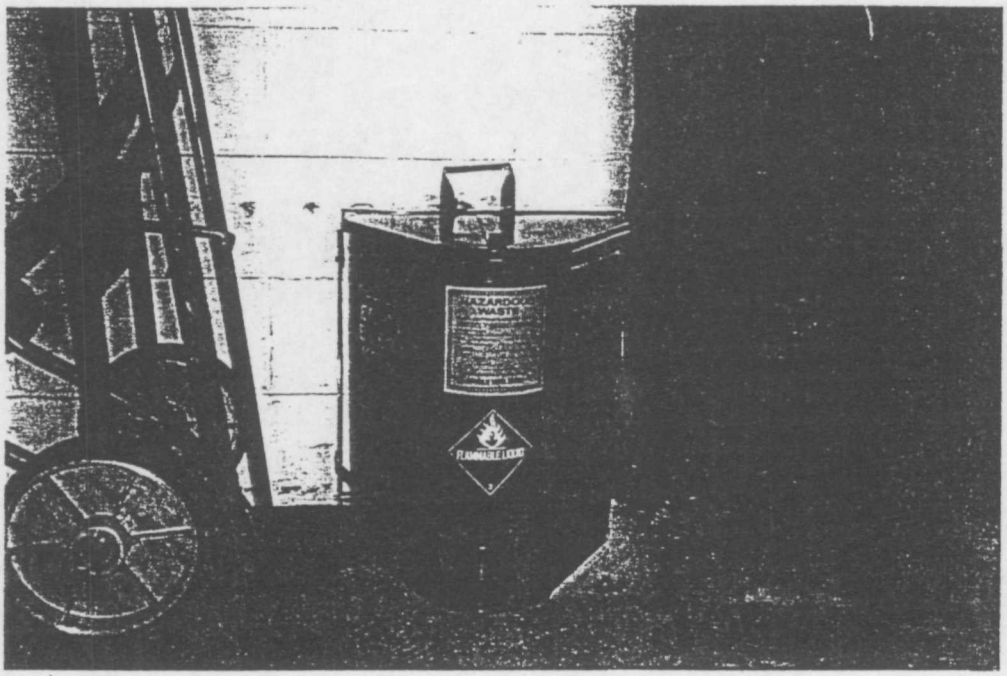


Photo No.: IEPA-7
Date: April 30, 1990

Time: 1044
Direction: West

Description: Solvent Soaked Rag Satellit Accumulation Area (part of SWMU 4).

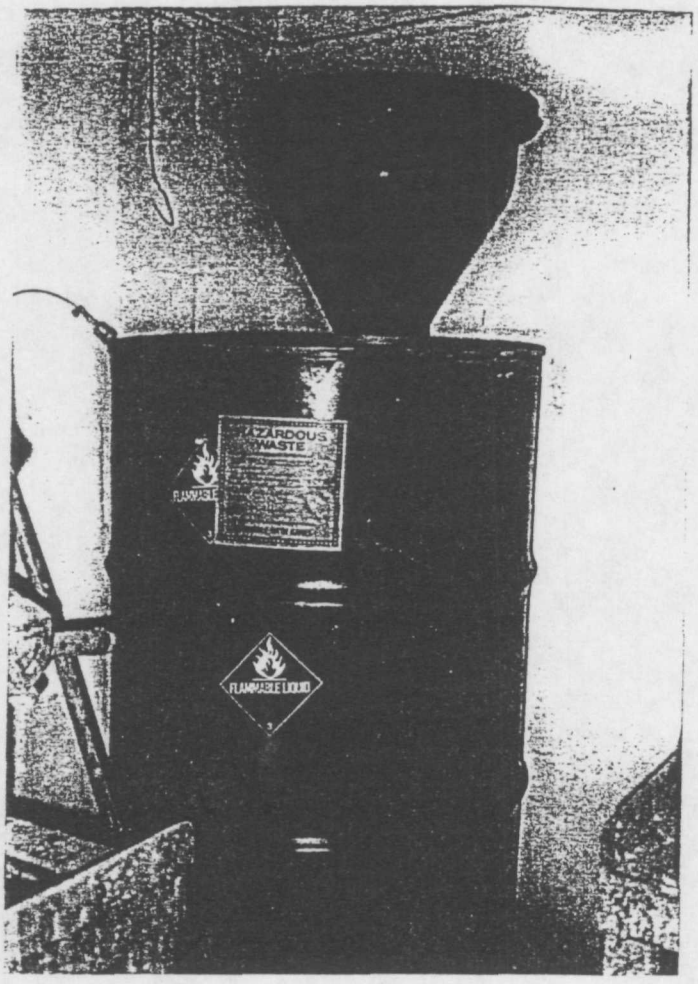


Photo No.: IEPA-8
Date: April 30, 1990

Time: 1014
Direction: Northwest

Description: Waste Flammable Liquid Satellite Acumulation Area (part of SWMU 4).

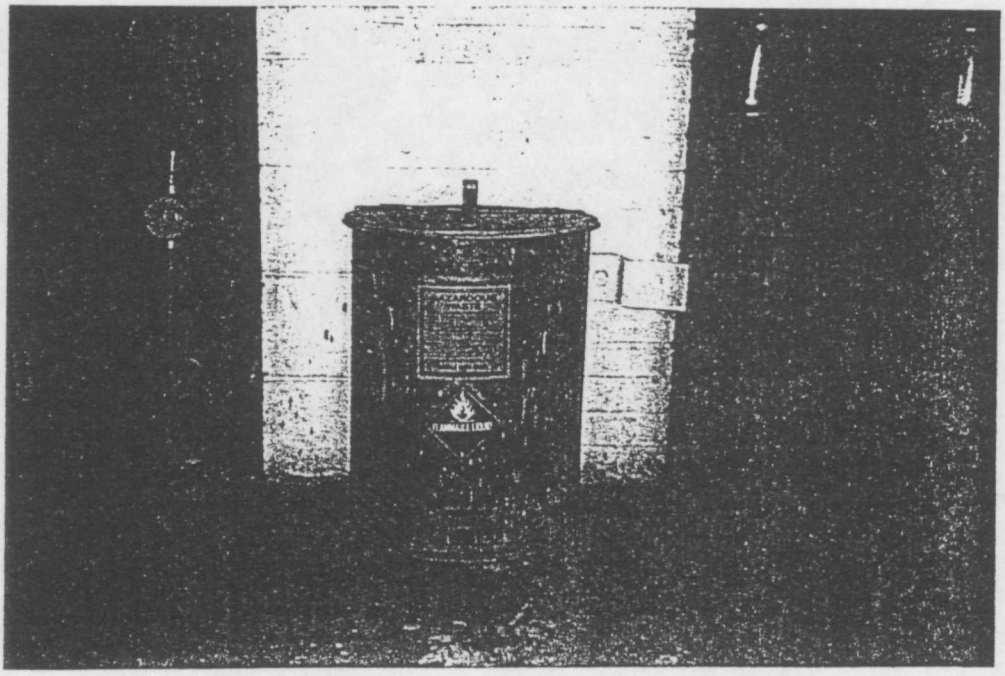


Photo No.: IEPA-9
Date: April 30, 1990

Time: 1014
Direction: North

Description: View of Solvent Soaked Rag Satallite Accumulation Area (part of SWMU 4).

Photo No.: IEPA-10
Date: April 30, 1990

Time: 1055
Direction: North

Description: View of 1,1,1-Trichloroethane Still Bottoms Satellite Accumulation Area (part of SWMU 4).

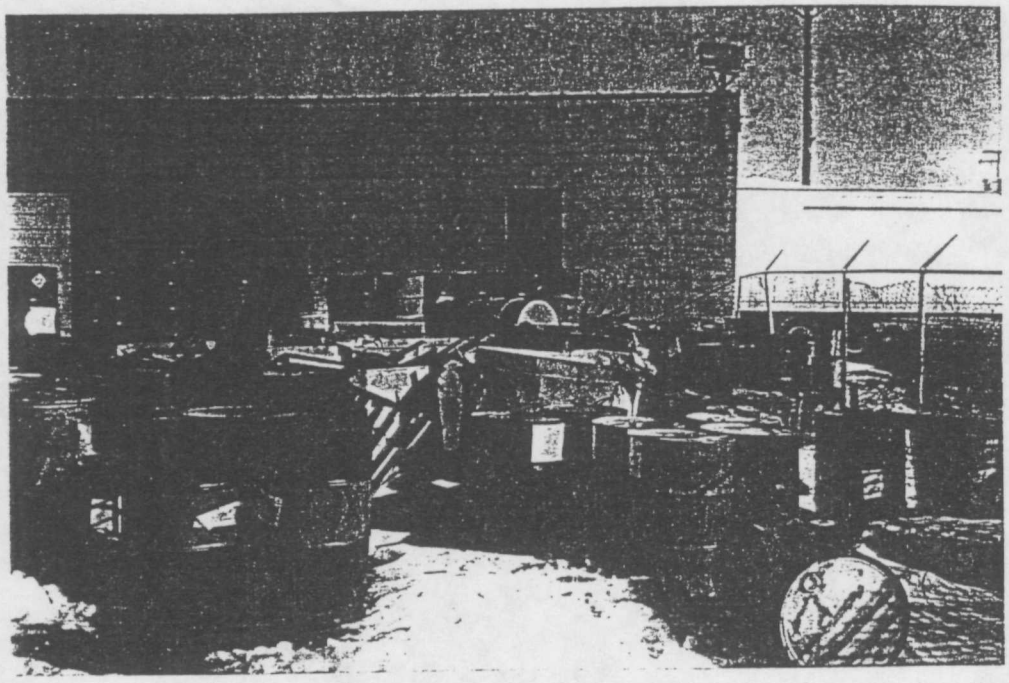


Photo No.: IEPA-11
Date: January 30, 1990

Time: 1350
Direction: East

Description: View of Unknown and Waste Oil Drum Storage Area (SWMU 5).

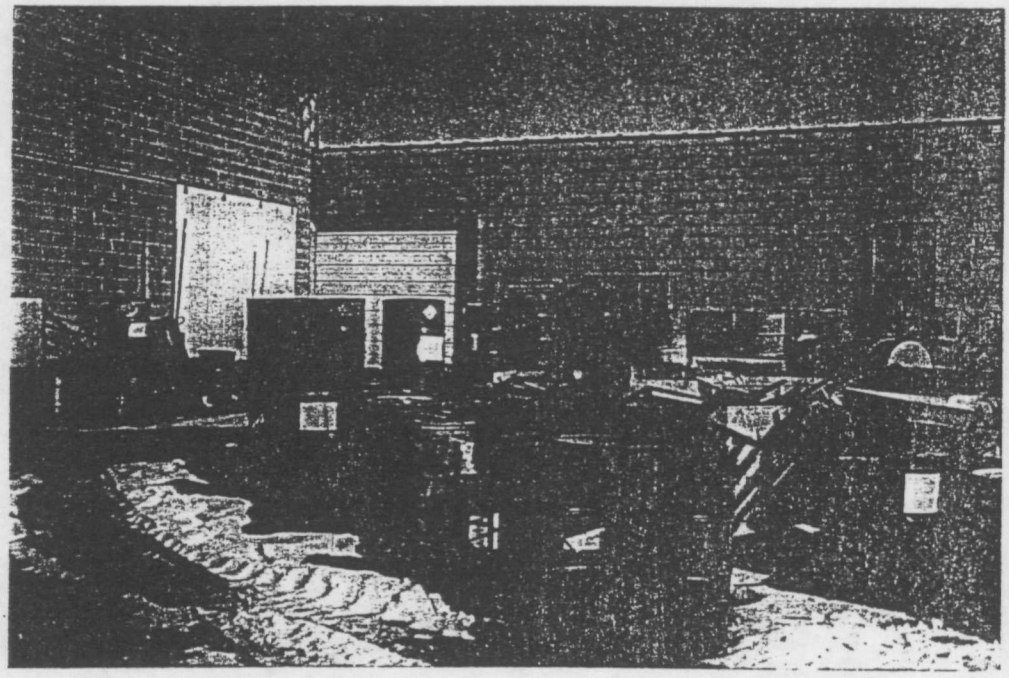


Photo No.: IEPA-12
Date: January 30, 1990

Time: 1350
Direction: Northeast

Description: View of Unknown and Waste Oil Drum Storage Area (SWMU 5).

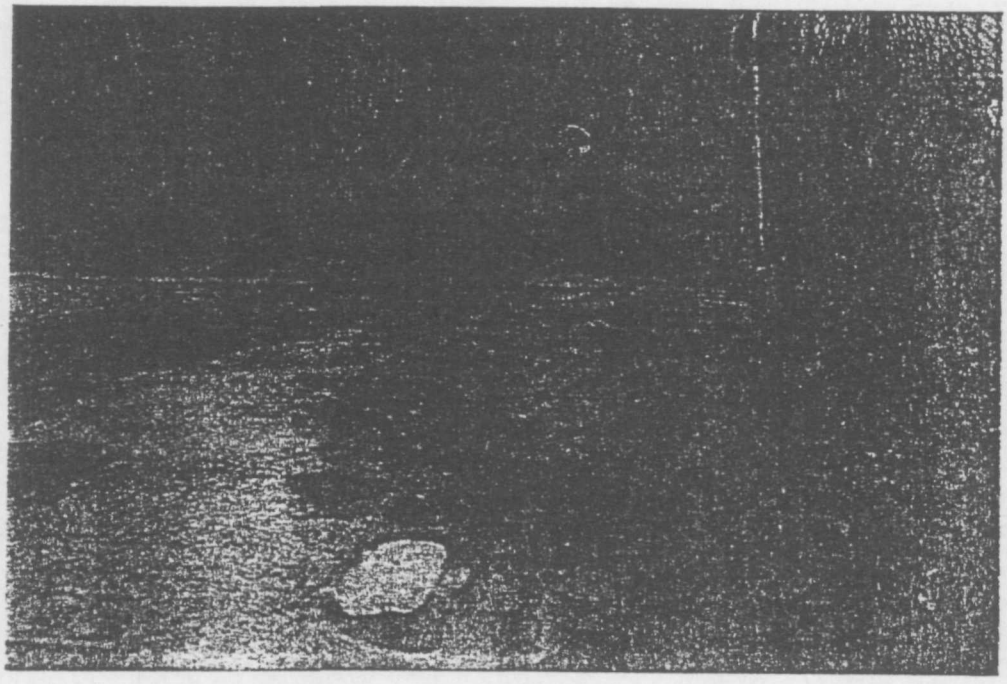


Photo No.: IEPA-13
Date: April 30, 1990

Time: 1023
Direction: East

Description: View of Unknown and Waste Oil Drum Storage Area (SWMU 5).

Photo No.: IEPA-14
Date: April 30, 1990

Time: 1040
Direction: East

Description: View of Indoor Hazardous Wasste Acccumulation Area (SWMU 6).

Photo No.: IEPA-15
Date: April 30, 1990

Time: 1040
Direction: East

Description: View of Indoor Hazardous Wasste Acccumulation Area (SWMU 6).

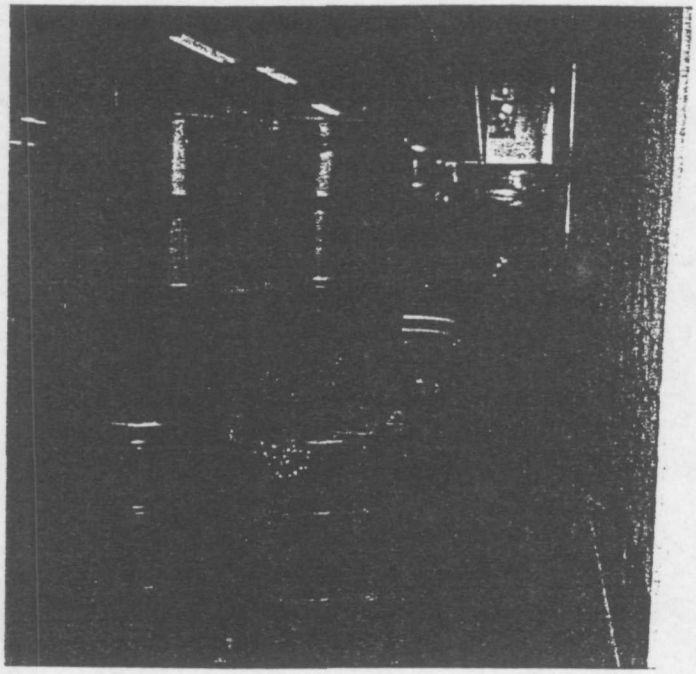


Photo No.: IEPA-16
Date: April 30, 1990

Time: 1040
Direction: East

Description: View of Indoor Hazardous Wasste Acccumulation Area (SWMU 6).

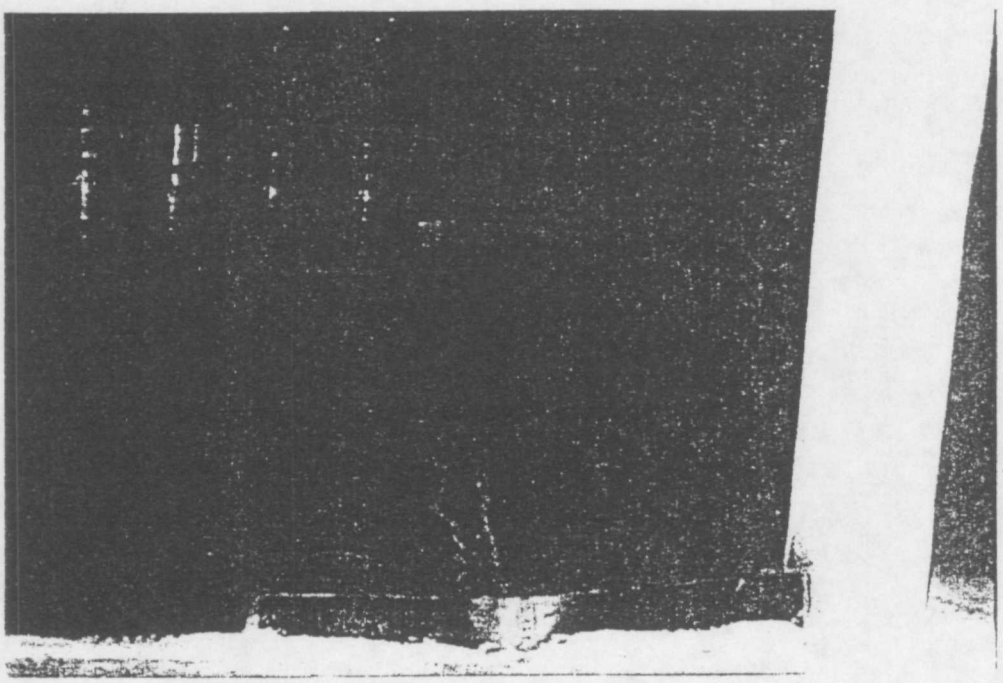


Photo No.: IEPA-17
Date: April 30, 1990

Time: 1042
Direction: South

Description: View of Indoor Hazardous Waste Acccumulation Area (SWMU 6).

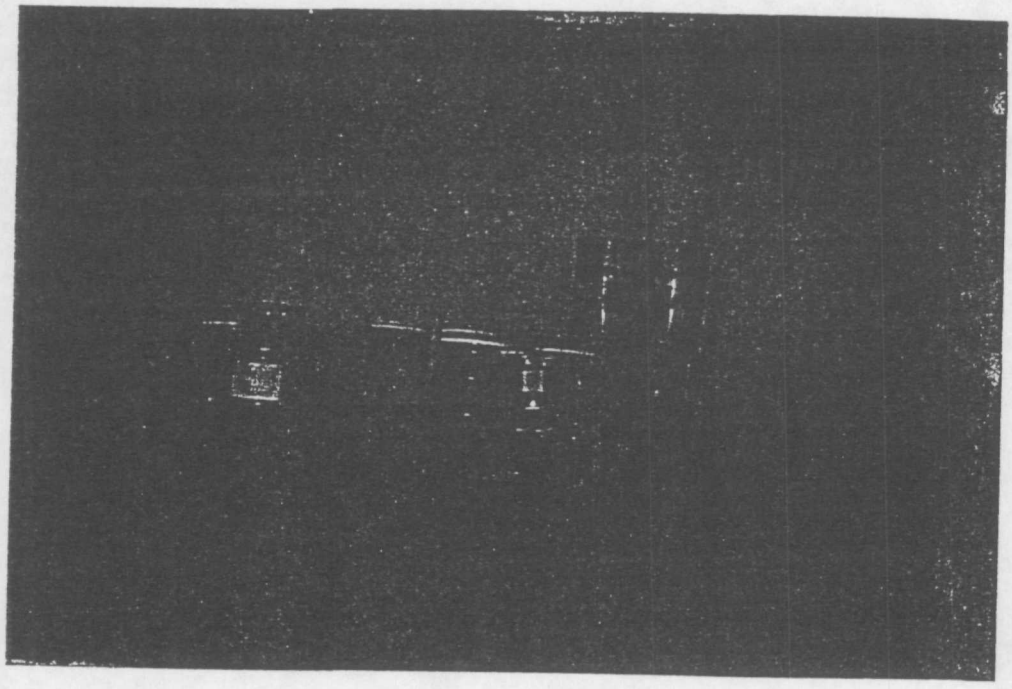


Photo No.: IEPA-18
Date: April 30, 1990

Time: 1043
Direction: South

Description: View of Indoor Hazardous Wasste Acccumulation Area (SWMU 6).

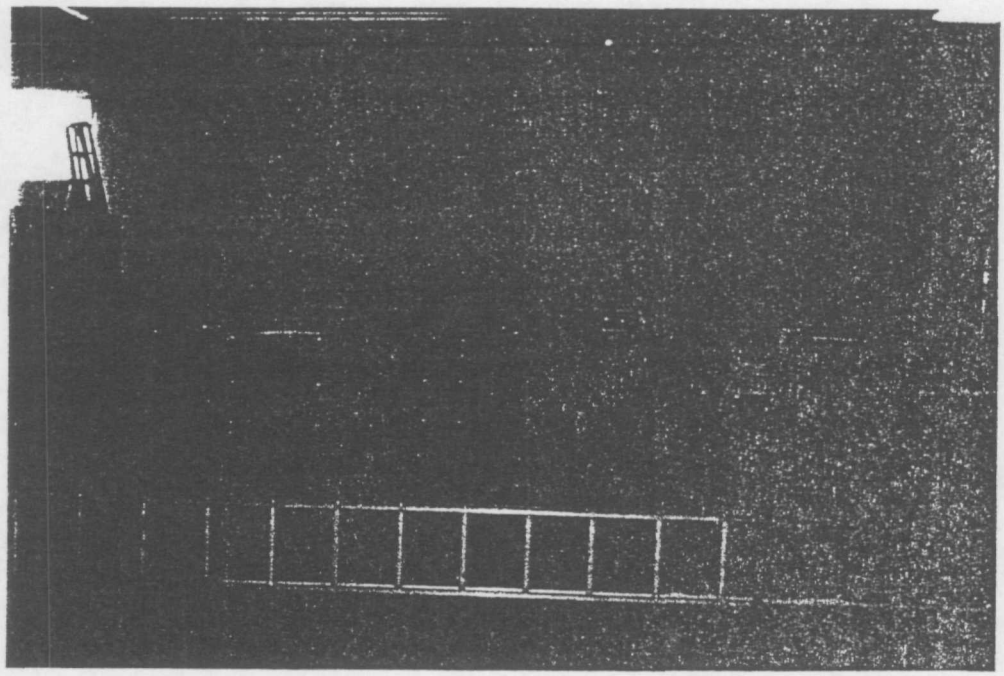


Photo No.: IEPA-19
Date: April 30, 1990

Time: 1043
Direction: South

Description: View of Indoor Hazardous Wasste Acccumulation Area (SWMU 6).

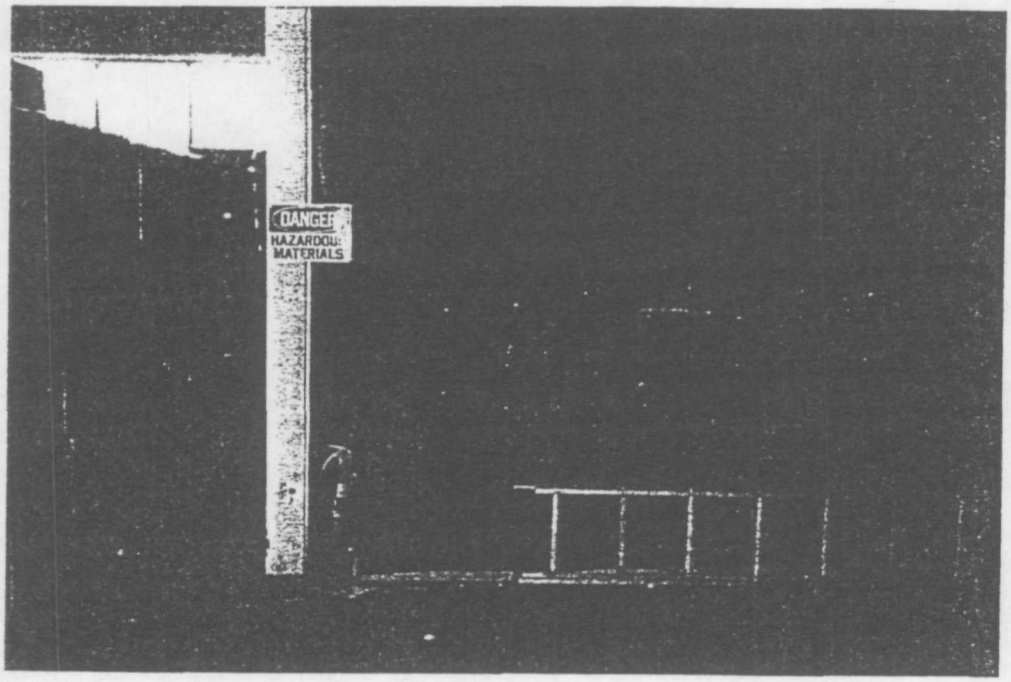


Photo No.: IEPA-20
Date: April 30, 1990

Time: 1043
Direction: South

Description: View of Indoor Hazardous Waste Acccumulation Area (SWMU 6).

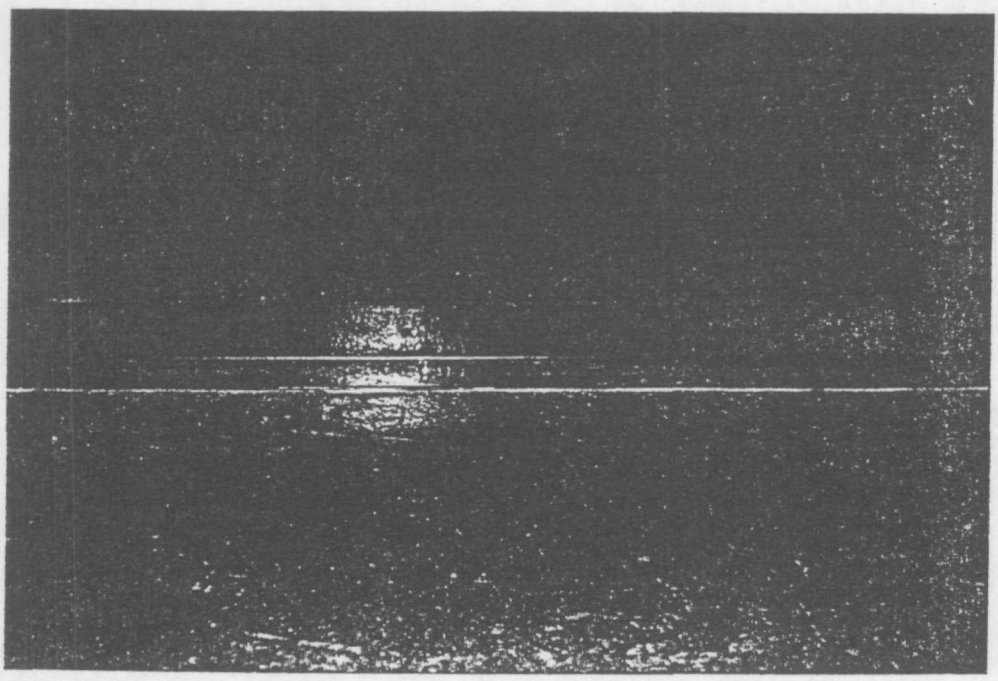
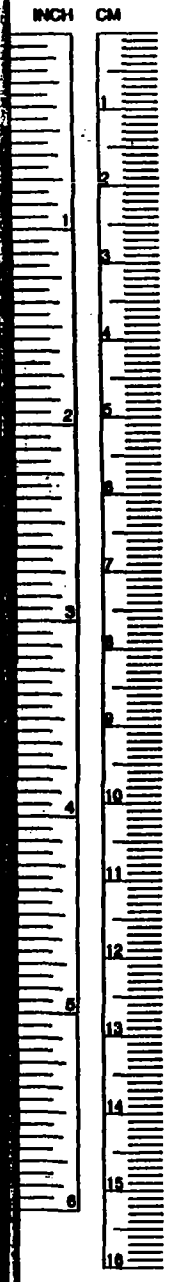


Photo No.: IEPA-21
Date: April 30, 1990

Time: 1043
Direction: South

Description: View of berm which borders the Indoor Hazardous Wasste Acccumulation Area (SWMU 6) on the north, east and south sides.

APPENDIX B
Visual Site Inspection Field Notebook



MEASUREMENT CONVERSIONS

IF YOU KNOW	MULTIPLY BY	TO FIND
LENGTH		
inches	2.540	centimeters
feet	30.480	centimeters
yards	0.914	meters
miles	1.609	kilometers
millimeters	0.039	inches
centimeters	0.393	inches
meters	3.280	feet
meters	1 093	yards
kilometers	0.621	miles
WEIGHT		
ounces	28.350	grams
pounds	0.453	kilograms
grams	0.035	ounces
kilograms	2.204	pounds
VOLUME		
fluid ounces	29.573	milliliters
pints	0.473	liters
quarts	0.946	liters
gallons (U.S.)	3.785	liters
milliliters	0.033	fluid ounces
liters	1.056	quarts
liters	0.264	gallons (U.S.)
TEMPERATURE		

°C = (°F - 32) x .555
°F = (°C x 1.8) + 32

Inches	Decimals of foot	Milli-meters
1/16	.0052	1.5875
1/8	.0104	3.1750
3/16	.0156	4.7625
1/4	.0208	6.3500
5/16	.0260	7.9350
3/8	.0313	9.5250
1/2	.0417	12.700
5/8	.0521	15.875
3/4	.0625	19.050
7/8	.0729	22.225
1"	.0833	25.400
2"	.1667	50.800
3"	.2500	76.200
4"	.3333	101.60
5"	.4167	127.00
6"	.5000	152.40
7"	.5833	177.80
8"	.6667	203.20
9"	.7500	228.60
10"	.8333	254.00
11"	.9167	279.40
1 foot	1.0000	304.80

"Rite in the Rain"®
ALL-WEATHER WRITING PAPER

Name Louise La Company
2107 Kishwaukee St.
Address Rockford, IL
Nov. 4, 1997
Phone

Project PA/VSI Team:
Alison Evans, TechLaw
Bill Goold, TechLaw
Peter Schultz, Counselor Co.
Newell, Co.

"Rite in the Rain" - a unique all-weather writing surface created to shed water and to enhance the written image. Makes it possible to write sharp, legible field data in any kind of weather.

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J. L. DARLING CORPORATION
TACOMA, WA 98421-3696 USA

CONTENTS

PAGE	REFERENCE	DATE

November 4, 1997
1:00pm – 2:15 pm

"x" facilities new Corsicana facility
from Newell Co.

- generators were sold Dec 95
- ~~Kathy Crapen~~ NE Nov 4, 97
- operations closed down 94
- Connecticut operated since 60 or so
- Beerky industry became Connecticut @ 60
- outdoor and Haz waste drum found over 90 days storage
- waste storage area outside stored spent paints + solvents
- paints visible in gravel
- excavation, Pb contamination
- final excavation closure Sept 97

A Evans
Nov 4, 1998

pictures 10 facing east
11 facing west
outdoor waste storage
area (SOI)

- many pallets stored outside

- adjoins building acquired 89
(structure ajoined.

- Above GTST located to North
of old C. Co. building

Degreasing unit
- located inside
- sludge was shipped out
Pickable soil ~~clean~~ AE Nov 4,98 contamination
outside
Alley clean up (SO2)
TCA contamination

SO1 source of 40 Tons of soil

picture 12 - facing waste
TCA release area
the Alley

A Evans
Nov 4, 1999

when required adjoining building cleaned out
non-[illegible]

new Building: old dye-cast building
HAZ
- INDOOR WASTE STORAGE AREA
(STAGING AREA)
- all out 93 or 94
- Floor somewhat pitted
- no signs of release
- mixed waste paint, oil, rags
degreaser still bottoms

→ picture 13 of SWMU above facing South
→ picture 14:
- ~~[illegible]~~ AF, paint waste + filters storage
area upstairs, clean

- in NEW building Above Ground Storage
tank for fuels → removed

- alkaline paint stripper unit
area
↳ heat treatment. degreaser
↳ corrosive waste manifests

A Evans
Nov 4, 1997

⇒ Photo 13
- degreaser area
- floor appears solid
- TCA used for degreasing
- heat transmit. unit
- waste stored in drums, staged to SOZ, then to Dye cast ~~Stor~~ NE building area See Sketch C.

⇒ photo 16: incinerator located in same room w/ degreaser

paint storage shed (no picture)
- stored paints
- mixed paints
- cleaning fluids
- testing done under one side (parking lot facing side of shed by RCA)
- floor cracked

APPENDIX C
Facility Locations
Facility Layout and SWMU Locations

Figure 10: Site Location Map.

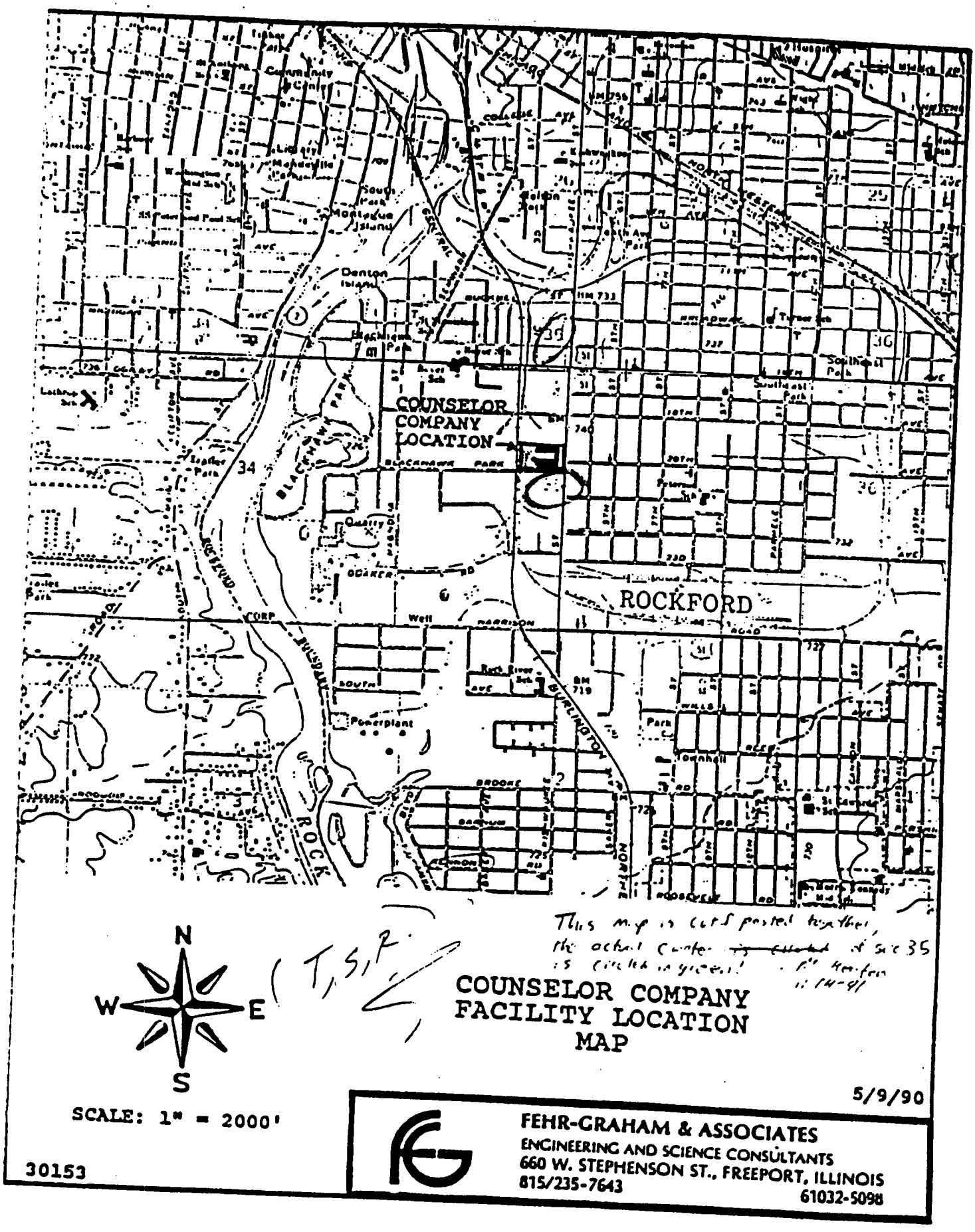
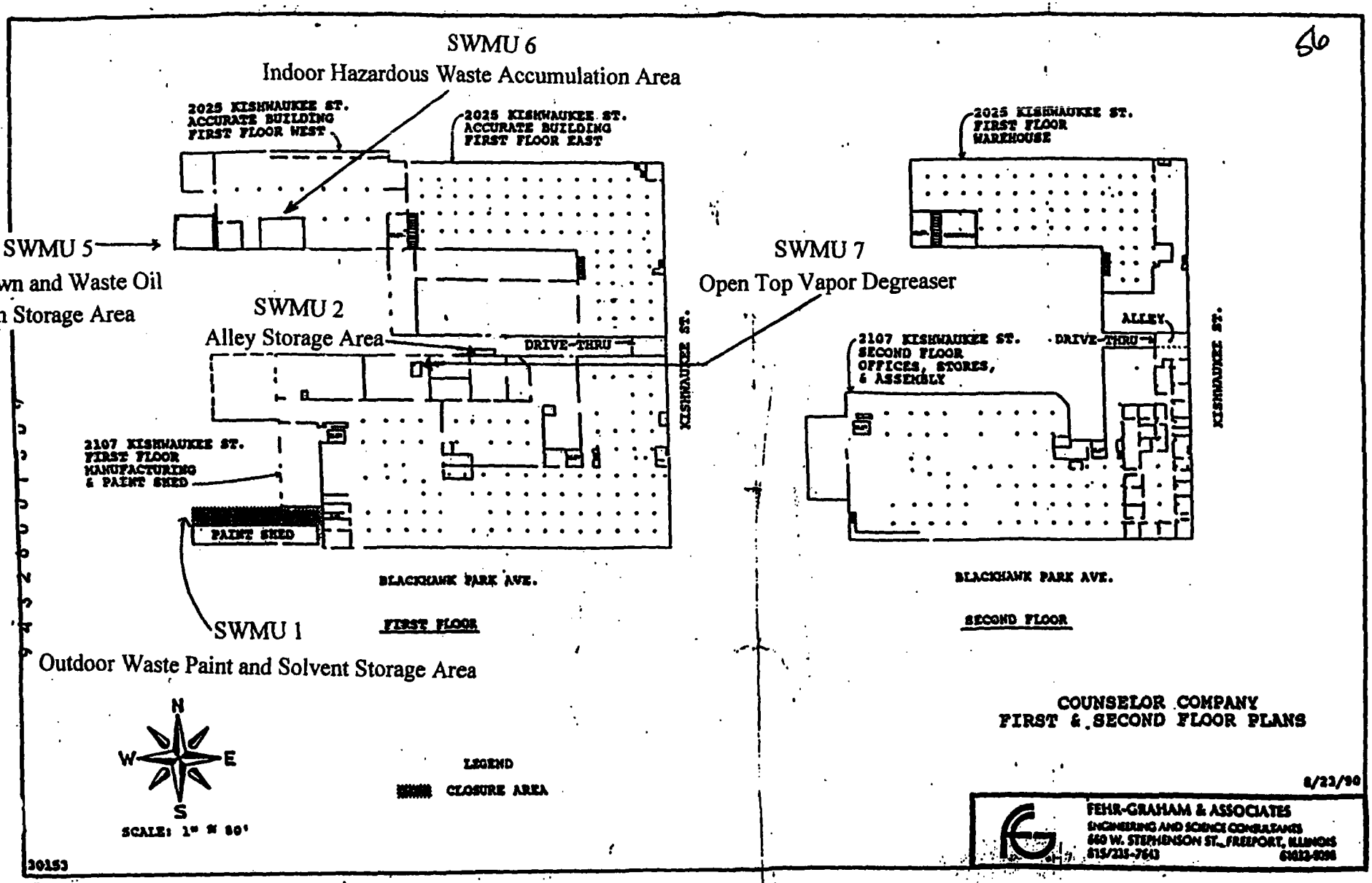


Figure 1: Facility Layout and SWMU locations. The exact location of the 2,000 Gallon Waste Oil Underground Storage Tank (SWMU 3) is not known. The Satellite Accumulation Areas (SWMU 4) are located throughout the facility.



APPENDIX D
Data Tables, Sampling Locations and Data Sheets

Table 2: Summary of analytical results for Outdoor Waste Paint and Solvent Storage Area (SWMU 1) early 1991 soil samples. See Figure 6 for sample locations.

Illinois Environmental Protection Agency • P. O. Box 19276, Springfield, IL 62794-9276

Counselor Company
Sample/Analytical Results

	#1	#2	#3	#4	Grab Samples
Volatiles (8240) (PPB)					
Methylene Chloride	5328.0		981.5	1097.0	
Chloroform	62.28	108.5	150.5	107,5	
1,1,1 Trichloroethane	351.4	280.5	195.8		48.0
Bromodichloromethane	52.57	112.2	117.0	96.09	
1,1,2,2 Tetrachloroethane		39.14	216.1	184.9	
Trichloroethane			201.4		17.0
1,1,2 Trichloroethane	332.3	225.6	154.1		
Tetrachloroethane	163.8		157.6	179.8	19.0
Toluene	373.8	303.3	418.2	498.8	
Methyl Ethyl Ketone					25.0
Cis-1-2-Dichloroethane					7.5
Xylene					16.0
Benzene	177.9				
Semi-Volatiles (8270) (PPB)					
Di-N-Butyl Phtalate		4412.2			
Flouranthene		1010.4			
Pyrene		1133.04			
Metals (TCLP) (PPM)					
Lead		0.57		0.55	
Selenium		1.90			
Barium	1.43	0.47	0.74	0.53	
Cadmium	0.14		0.06		
Chromium	0.03				

TEF:sap/0300q,99-95

Table 3: Soil sample analysis results for Outdoor Waste Paint and Solvent Storage Area (SWMU 1) sampling events April 1991, March 1991, and July 1991.

Sample Number	0302	0401	0402	1201	1202	1203	1204	1401A	1401a
EPA METHOD 8240 (ppb)									
Acetone					BDL	BDL	BDL	178	
Benzene								178	
Bromodichloromethane									
Chlorobenzene									
Chloroform									
1,1-Dichloroethane									
Methylene chloride							33		
1,1,1,2-Tetrachloroethane									
1,1,2,2-Tetrachloroethane									
Tetrachloroethene							19		20
Toluene							6		
1,1,1-Trichloroethane							284		
1,1,2-Trichloroethane						8			
Trichloroethene							19		
Trichlorofluoromethane									
Vinyl Chloride							26		
Xylenes							32		
EPA METHOD 8270 (ppb)									
Bis(2-ethylhexyl)phthalate									
Diethyl Phthalate		1354							
Di-n-butyl phthalate									
Fluoranthene									
Pyridine									
EPA METHOD 1311 (TCLP Metals)									
Arsenic		<0.01					<0.01	<0.01	
Barium		0.87					0.79		0.66
Cadmium		<0.01					<0.01	<0.01	
Chromium		<0.01					<0.01	<0.01	
Chromium, Hexavalent									
Lead		<0.05					<0.01	<0.01	
Mercury		<0.0002					<0.0005	<0.0004	
Selenium		<0.10					<0.10	<0.10	
Silver		<0.01					<0.01	<0.01	

Sample Number	COUNSELOR CO. 001	002	003	004	0101	0102	0201	0202	0301
EPA METHOD 8240 (ppb)									
Acetone					1858	1128	966	505	397
Benzene	177.9								
Bromodichloromethane	52.57	112.2	117	96.09					
Chlorobenzene	177.9								
Chloroform	62.28	108.5	150.5	107.5					
1,1-Dichloroethane									
Methylene chloride	5328		981.5	1097					
1,1,1,2-Tetrachloroethane									
1,1,2,2-Tetrachloroethane		39.14	216.1	184.9					
Tetrachloroethene	163.8	BDL	157.6	179.8					
Toluene	373.8	303.3	418.2	498.8		10			
1,1,1-Trichloroethane	351.4	280.5	195.8						
1,1,2-Trichloroethane	332.3	225.6	154.1						
Trichloroethene	163.8		201.4						
Trichlorofluoromethane									
Vinyl Chloride									
Xylenes						13			
EPA METHOD 8270 (ppb)									
Bis(2-ethylhexyl)phthalate		113.04					372		
Diethyl Phthalate									
Di-n-butyl phthalate		4412.2					1395		1338
Fluoranthene		1010.4							
Pyridine		1133.04							
EPA METHOD 1311 (TCLP Metals)	(ppm)								
Arsenic	<0.32	<0.01	<0.01	<0.01	<0.01		<0.01	<0.01	
Barium	1.43	0.47	0.74	0.53	1.06		0.64		0.92
Cadmium	0.14	<0.01	0.06	<0.01	<0.01		<0.01	<0.01	
Chromium	0.05	<0.01	<0.01	<0.005	<0.01		<0.01	<0.01	
Chromium, Hexavalent	<0.01	<0.01	<0.01	<0.01					
Lead	<0.05	0.57	<0.09	0.55	<0.05		<0.05	<0.05	
Mercury	<0.05	<0.05	<0.05	<0.05	<0.0002		<0.0002	<0.0002	
Selenium	<0.17	1.9	<0.13	<0.17	<0.10		<0.10	<0.10	
Silver	<0.01	<0.004	<0.004	<0.01	<0.01		<0.01	<0.01	

Table 4: Soil sample analysis results for Outdoor Waste Paint and Solvent Storage Area (SWMU 1) sampling events April 1991, March 1991, and July 1991.

	A	B	C	D	E	F	G	H	I	J
1		COUNSELOR		CO.	✓	✓	✓	OK	✓	✓
2	Sample Number	1402A	1402B	1403A	1501	1502	1503	1504	1505	1506
3	EPA METHOD 8240 (ppb)									
4	Acetone 700	157	131	227						
5	Benzene 5									
6	Bromodichloroethane 1									
7	Chlorobenzene									
8	Chloroform 6.5									
9	1,1-Dichloroethane 70 ✓									
10	Methylene chloride 5									
11	1,1,1,2-Tetrachloroethane									
12	1,1,2,2-Tetrachloroethane									
13	Tetrachloroethene 5	9	7	38						
14	Toluene 1000 ✓			13					11.5	
15	1,1,1-Trichloroethane 200			18		61.5				
16	1,2-Trichloroethane 5									
17	Trichloroethene 5			31						
18	Trichlorofluoromethane									
19	Vinyl Chloride .2 ✓									
20	Xylenes			25						
21								NO		
22	EPA METHOD 8270 (ppb)									
23	Bis(2-ethylhexyl)phthalate 80							356	?	356
24	Dimethyl Phthalate									
25	Di-n-butyl phthalate 14000 ✓									
26	Fluoranthene 5600 ✓								X 203	
27	Pyridine									
28										
29	EPA METHOD 1311 (TCLP Metals) ppm									
30	[illegible]ic	<0.01	<0.01	<0.01			<0.01	<0.01	<0.01	<0.01
31	Barium 2 ✓	0.57	0.66	0.65			[illegible]		[illegible]	0.6
32	Cadmium .005	<0.01	<0.01	<0.01			<0.001	<0.001	<0.001	<0.001
33	Chromium .1	<0.01	<0.01	<0.01			<0.001	<0.001	<0.001	<0.001
34	Chromium, Hexavalent									
35	Lead .05	<0.01	<0.01	<0.01			<0.001	<0.001	<0.001	<0.001
36	Mercury	<0.0005	<0.0005	<0.0004			<0.0004	<0.0004	<0.0004	<0.0004
37	Selenium .05	<0.10	<0.10	<0.10			<0.10	<0.10	<0.10	<0.10
1	Silver	<0.01	<0.01	<0.01			<0.01	<0.01	<0.01	<0.01
2										

Table 5: Summary of positive (detect) confirmatory soil sample results for Outdoor Waste Paint and Solvent Storage Area (SWMU 1.) All measurements in mg/kg.

Sample Number	CB	ASL	3016-1	3016-2	4001-1	4001-2	4002-1	4002-2	4003-1	4003-2	4004-1	4004-2	4005-1	4005-2		
[illegible] (EPA METHOD 8240)			0'-12"	18'-24"	0'-12"	18'-24"	0'-12"	18'-24"	0'-12"	18'-24"	0'-12"	18'-24"	0'-12"	18'-24"	0'-12"	18'-24"
Acetone	0.7	0.1	BDL	BDL	100	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Acetonitrile			BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Acrolein			BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Acrylonitrile			BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Allyl alcohol			BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Allyl chloride			BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Benzene	0.003	0.003	0.07	0.004	0.004	0.033	0.004	0.004	0.194	0.004	0.144	0.004	0.004	0.004		
Bromobenzene		0.001	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Bromochloroethane	0.001	0.002	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Benzyl chloride			BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Bromoacetone			BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Bromodichloroethane	no	0.001	0.04	0.02	0.004	0.183	0.054	0.099	0.049	0.0203	0.014	0.004	0.017	0.159		
Bromoform	no	0.002	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	1.415	BDL	BDL	BDL	BDL
Bromomethane			BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
n-Butylbenzene	no		0.547	BDL	BDL	BDL	BDL	BDL	0.266	3.172	BDL	BDL	BDL	BDL	BDL	BDL
sec-Butylbenzene	no		0.325	0.074	7.7	7.878	0.74	1.166	1.051	0.777	10.767	1.317	1.13	6.899		
tert-Butylbenzene	no		0.733	0.041	10.544	6.632	0.744	BDL	0.274	0.435	9.699	BDL	2.619	7.654		
2-Butanone			BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Carbon disulfide			BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Carbon Tetrachloride	no		0.004	BDL	0.004	BDL	BDL	BDL	BDL	BDL	BDL	0.004	BDL	BDL	BDL	BDL
Chlorobenzene	0.1	0.002	BDL	0.004	1.678	0.796	0.032	0.044	0.025	0.02	6.144	0.564	0.062	0.51		
Chlorodibromomethane			BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Chloroethane	no		BDL	BDL	BDL	0.708	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
2-Chloroethanol			BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
2-Chloroethyl vinyl ether			BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Chloroform	0.0005	0.0005	BDL	BDL	0.004	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Chloromethane			BDL	BDL	BDL	BDL	BDL	BDL	0.609	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Chloropropene			BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
3-Chloropropionitrile			BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
2-Chlorotoluene	no		0.88	0.441	8.853	7.549	0.909	3.107	1.947	2.19	11.896	7.219	1.543	8.726		
4-Chlorotoluene	no		1.097	0.277	9.501	7.549	3.706	3.922	1.846	2.401	11.896	3.565	3.434	8.726		
Dibromochloromethane	no		BDL	0.041	8.557	BDL	0.077	1.949	BDL	BDL	10.615	BDL	3.025	BDL		
1,2-Dibromo-3-chloropropane	no		0.744	BDL	BDL	BDL	BDL	BDL	0.773	BDL	BDL	BDL	BDL	BDL	BDL	BDL
1,2-Dibromoethane	no		0.024	0.004	0.004	0.044	0.004	0.012	0.004	0.004	0.004	0.004	0.004	0.004		
Dibromomethane			BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
1,4-Dichloro-2-butene			BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Dibromoethane			BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
1,2-Dichlorobenzene			BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
1,3-Dichlorobenzene			BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
1,4-Dichlorobenzene			BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
Dichlorodifluoromethane			BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
1,1-Dichloroethane	0.7	0.0007	0.431	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
1,2-Dichloroethane	0.005	0.0003	0.285	0.323	BDL	0.371	0.523	0.851	0.331	BDL	0.737	BDL	0.679	BDL		
1,1-Dichloroethene		0.0013	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
cis-1,2-Dichloroethene	no		16.75	17.052	BDL	BDL	16.776	16.651	17.056	16.938	16.181	0.004	17.349	16.559		
trans-1,2-Dichloroethene			BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
1,2-Dichloropropane	no		BDL	0.478	4.641	7.249	0.117	0.328	0.344	0.309	1.141	BDL	BDL	BDL	BDL	BDL
1,3-Dichloropropane	no		0.034	0.065	BDL	4.312	0.74	4.322	0.244	1.044	9.92	0.709	1.912	9.513		
2,2-Dichloropropane	no		1.74	1.192	0.004	0.004	1.175	1.166	1.195	1.186	1.133	0.004	1.208	1.16		
1,1-Dichloropropene	no		0.563	0.057	0.004	0.208	BDL	0.156	0.016	0.028	0.012	0.004	BDL	BDL	BDL	BDL
3-Dichloro-2-propanol			BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL
cis-1,3-Dichloropropene			BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL

Table 6: Summary of positive (detect) confirmatory soil sample results for Outdoor Waste Paint and Solvent Storage Area (SWMU 1.) All measurements in mg/kg.

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R
thylbenzene	[illegible]		0.667	0.268	12.903	15.614	2.547	0.184	0.495	0.727	18.44	8.505	0.343	10.463			
thylene oxide			BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL			
thyl methacrylate			BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL			
-Hexanone			BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL			
exachlorobutadiene			BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL			
-Hydroxypropionitrile			BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL			
odoethane			BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL			
sobutyl alcohol			BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL			
sopropylbenzene	[illegible]		1.053	0.004	6.963	6.241	1.903	BDL	0.016	0.157	9.773	1.039	0.042	1.051			
-Isopropyltoluene	[illegible]		0.338	0.143	10.539	11.96	BDL	4.865	0.683	1.008	12.61	5.443	9.326	11.848			
ionitrile			BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL			
thacrylonitrile			BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL			
thylene chloride	0.005	0.005	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL			
thyliodide			BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL			
thyl methacrylate			BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL			
-Methyl-2-pentanone			BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL			
phthalene		0.002	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	0.857	BDL			
rachloroethene			BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL			
-Picoline			BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL			
propyl alcohol			BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL			
-Propiolactone			BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL			
opionitrile			BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL			
Propylbenzene	[illegible]		0.101	0.057	6.5798	10.969	2.157	4.765	0.352	0.821	11.803	5.8	3.902	9.418			
Propylamine			BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL			
ridine	0.007		BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL			
yrene			0.036	0.004	0.6473	BDL	BDL	0.068	0.021	0.028	8.775	0.216	0.025	BDL			
1,1,2-Tetrachloroethane			BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL			
1,2,2-Tetrachloroethane			BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL			
rachloroethene	0.005	0.0003	0.318	0.131	BDL	7.976	8.458	5.184	0.405	0.061	9.369	BDL	5.817	3.845			
luene	1	0.002	0.9	0.18	0.004	0.144	0.298	0.507	1.121	0.166	BDL	0.004	0.252	0.344			
2,3-Trichlorobenzene			BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL			
2,4-Trichlorobenzene			BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL			
1,1-Trichloroethane	0.2	0.0003	0.004	BDL	0.004	0.004	BDL	0.004	0.004	BDL	BDL	0.004	BDL	0.004			
1,2-Trichloroethane	0.005	0.0002	BDL	0.012	0.004	0.383	BDL	BDL	0.057	BDL	BDL	0.004	BDL	BDL			
ichloroethene	0.005	0.0012	0.322	0.021	BDL	0.071	0.093	0.034	0.143	0.02	BDL	BDL	0.062	BDL			
ichlorofluoromethane			BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL			
2,3-Trichloropropene	[illegible]		0.776	BDL	BDL	BDL	0.808	0.851	BDL	BDL	0.743	BDL	0.865	BDL			
2,4-Trimethylbenzene	[illegible]		3.05	0.069	9.524	9.186	2.197	2.668	1.808	BDL	10.541	5.068	2.34	7.519			
3,5-Trimethylbenzene	[illegible]		2.504	0.074	7.918	8.336	4.205	2.668	1.575	0.65	10.538	6.761	2.34	7.158			
yl acetate		0.0018	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL			
yl Chloride			BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL			
ylene	10	0.0005	0.414	0.078	1.472	9.015	1.143	1.514	0.111	0.849	13.157	0.596	3.17	1.629			
ylene		0.0005	BDL	BDL	8.522	180.412	1.682	1.474	BDL	BDL	BDL	BDL	4.692	1.72			
ylene		0.0005	0.229	0.012	3.177	8.778	0.209	0.154	0.315	0.033	11.17	0.921	0.099	0.439			

Table 7: Confirmatory Soil Sample Numbers and Locations for Outdoor Waste Paint and Solvent Storage Area (SWMU 1) confirmatory soil samples.

Sample Location	Sample Depth	Sample Number	Lab Number
1	6"-12"	3001	920527001
	18"-24"	3001-2	920529013
2	6"-12"	3002	920527001
	18"-24"	3002-2	920529014
3	6"-12"	3003	920527003
	18"-24"	3003-2	920529015
4	6"-12"	3004	920527004
	18"-24"	3004-2	920528013
5	6"-12"	3005	920522001
	18"-24"	3005-2	920528023
6	6"-12"	3006	920522002
	18"-24"	3006-2	920528015
7	6"-12"	3007	920527005
	18"-24"	3007-2	920529021
8	6"-12"	3008	920522003
	18"-24"	3008-2	920528017
9	6"-12"	3009	920522004
	18"-24"	3009-2	920528016
10	6"-12"	3010-1	920622010
	18"-24"	3010-2	920622009
11	6"-12"	4001	920527006
	18"-24"	4001-2	920529016
12	6"-12"	4002	920523012
	18"-24"	4002-2	920529017
13	6"-12"	4003	920523010
	18"-24"	4003-2	920528012
14	6"-12"	4004	920523007
	18"-24"	4004-2	920528011
15	6"-12"	4005	920523003
	18"-24"	4005-2	920527007
16	6"-12"	4006	920523006
	18"-24"	4006-2	920527008
17	6"-12"	4007	920523005
	18"-24"	4007-2	920528019
18	6"-12"	4008	920522005
	18"-24"	4008-2	920528020
19	6"-12"	4009	920528024
	18"-24"	4009-2	920528018
20	6"-12"	5001	920527009
	18"-24"	5001-2	920529019
21	6"-12"	5002	920523001
	18"-24"	5002-2	920529018
22	6"-12"	5003	920523011
	18"-24"	5003-2	920529020
23	6"-12"	5004	920523008
	18"-24"	5004-2	920528014
24	6"-12"	5005	920523009
	18"-24"	5005-2	920528022
25	6"-12"	5006	920523002
	18"-24"	5006-2	920527010
26	6"-12"	5007	920527011
27	6"-12"	5008	920522006
	18"-24"	5008-2	920527012
28	6"-12"	6005-1	920622010
	18"-24"	6005-2	920622009
29	6"-12"	6004-1	920622008
	18"-24"	6004-2	920622007
30	6"-12"	6003-1	920622006
	18"-24"	6003-2	920622005
31	6"-12"	6002-1	920622004
	18"-24"	6002-2	920622003
32	6"-12"	6001-1	920622002
	18"-24"	6001-2	920622001

Figure 1: Facility Layout and SWMU locations. The exact location of the 2,000 Gallon Waste Oil ground Storage Tank (SWMU 3) is not known. The Satellite Accumulation Areas (SWMU 4) are located throughout the facility.

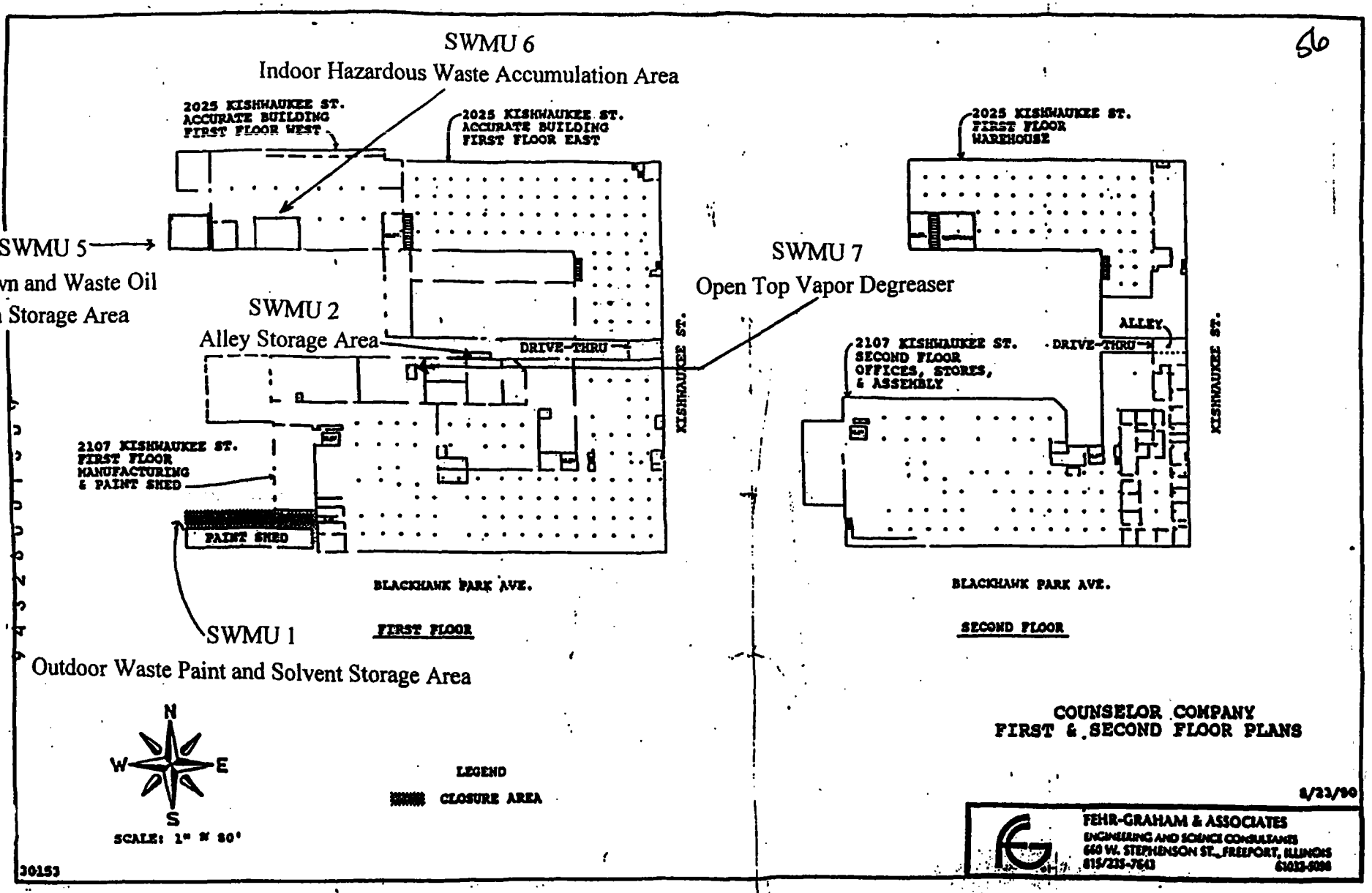


Figure 2: Ally Storage Area (SWMU 2) soil sample locations.

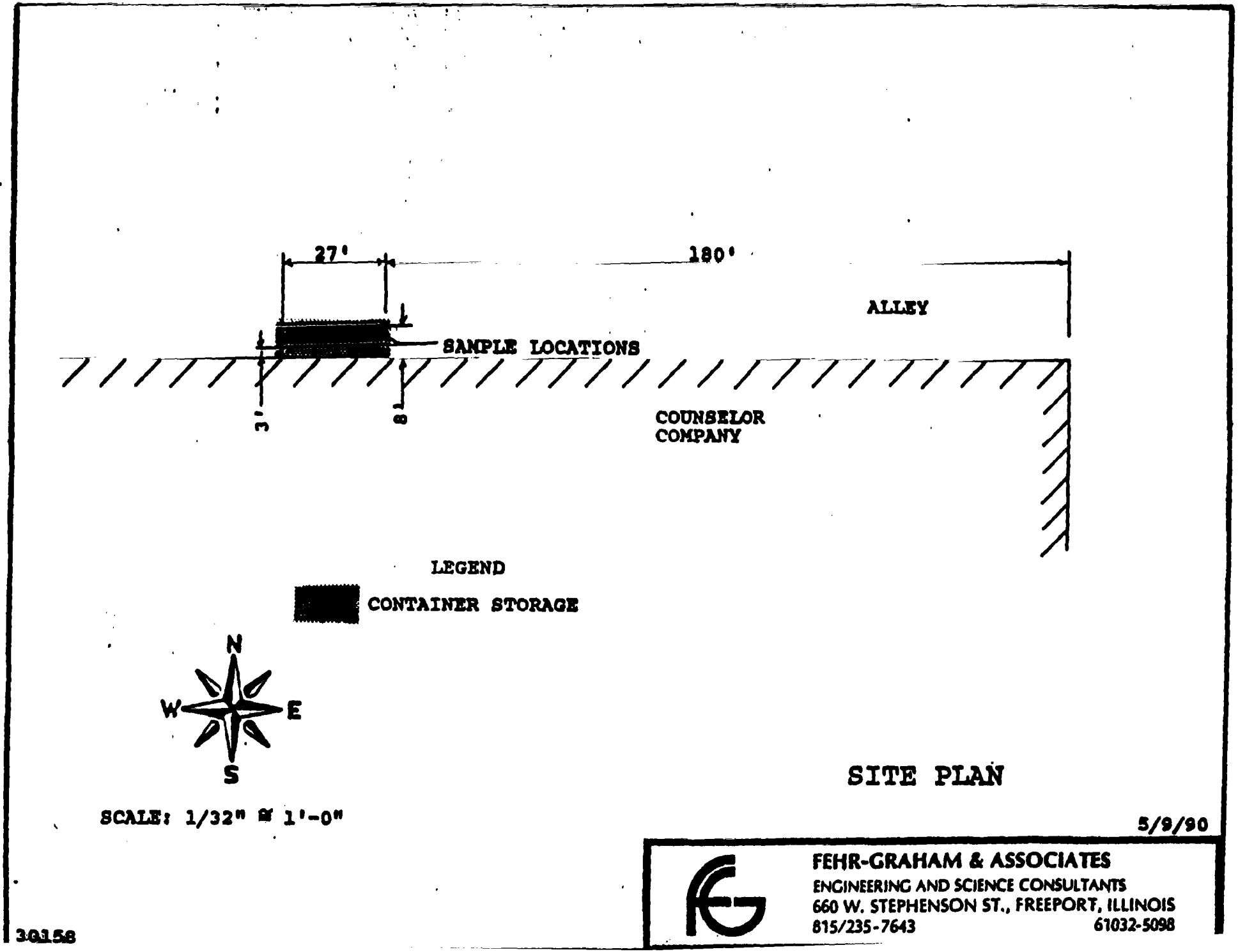


Figure 3: Outdoor Waste Paint and Solvent Storage Area (SWMU 1) soil sample locations.

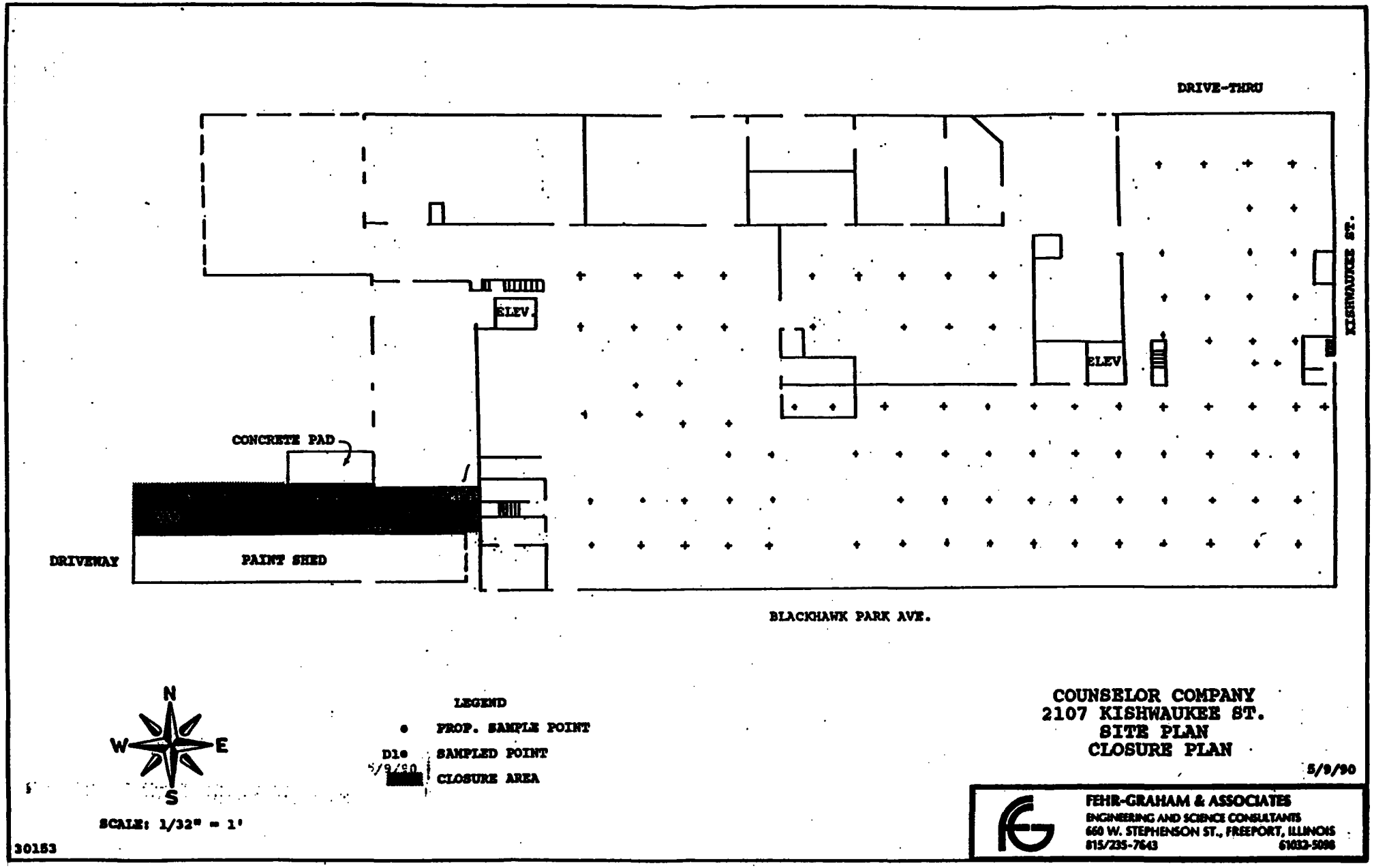


Figure 4: Indoor Hazardous Waste Accumulation Area (SWMU 6) sketch indicating specific waste storage areas, photograph views are indicated with arrows (from April 30, 1990 IEPA RCRA Inspection Report.)

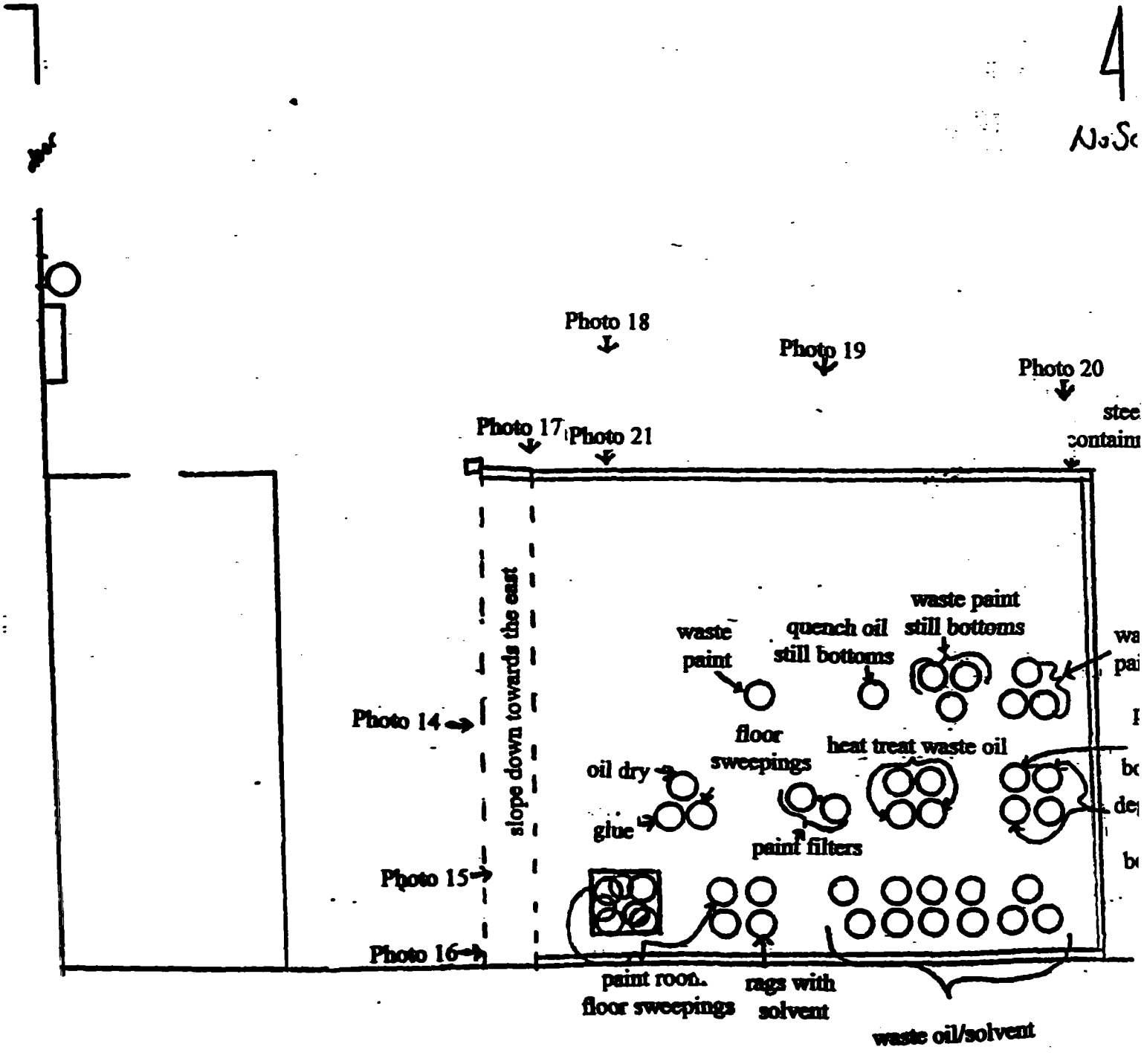


Figure 5: Locations for July 18, 1990 samples taken at Ally Storage Area (SWMU 2), analysis results are presented on Data Sheets 6, 7, 8, and 9.

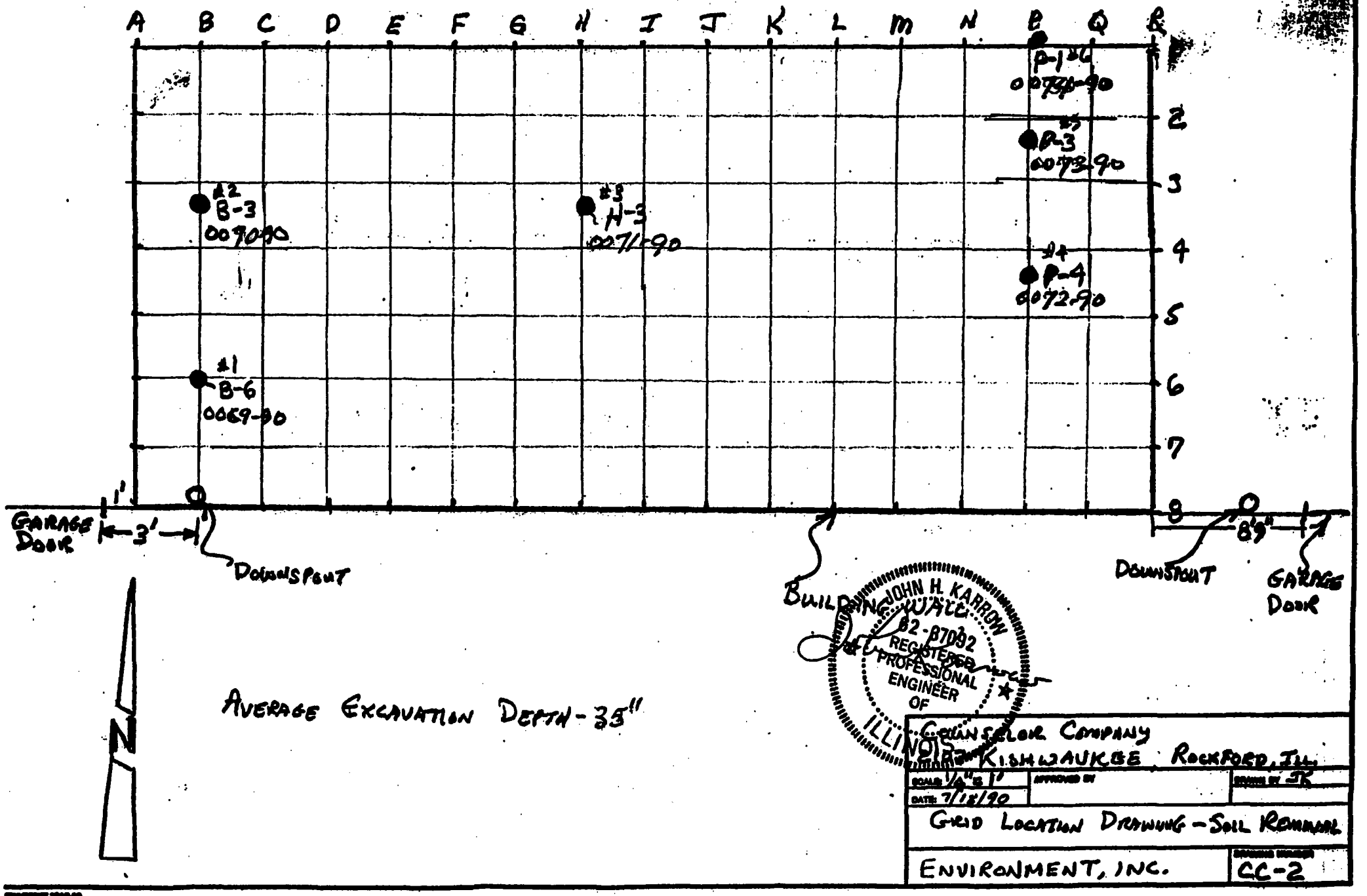


Figure 6: Sample locations for Outdoor Waste Paint and Solvent Storage Area (SWMU 1.) Early 1990 samples are indicated with a *.

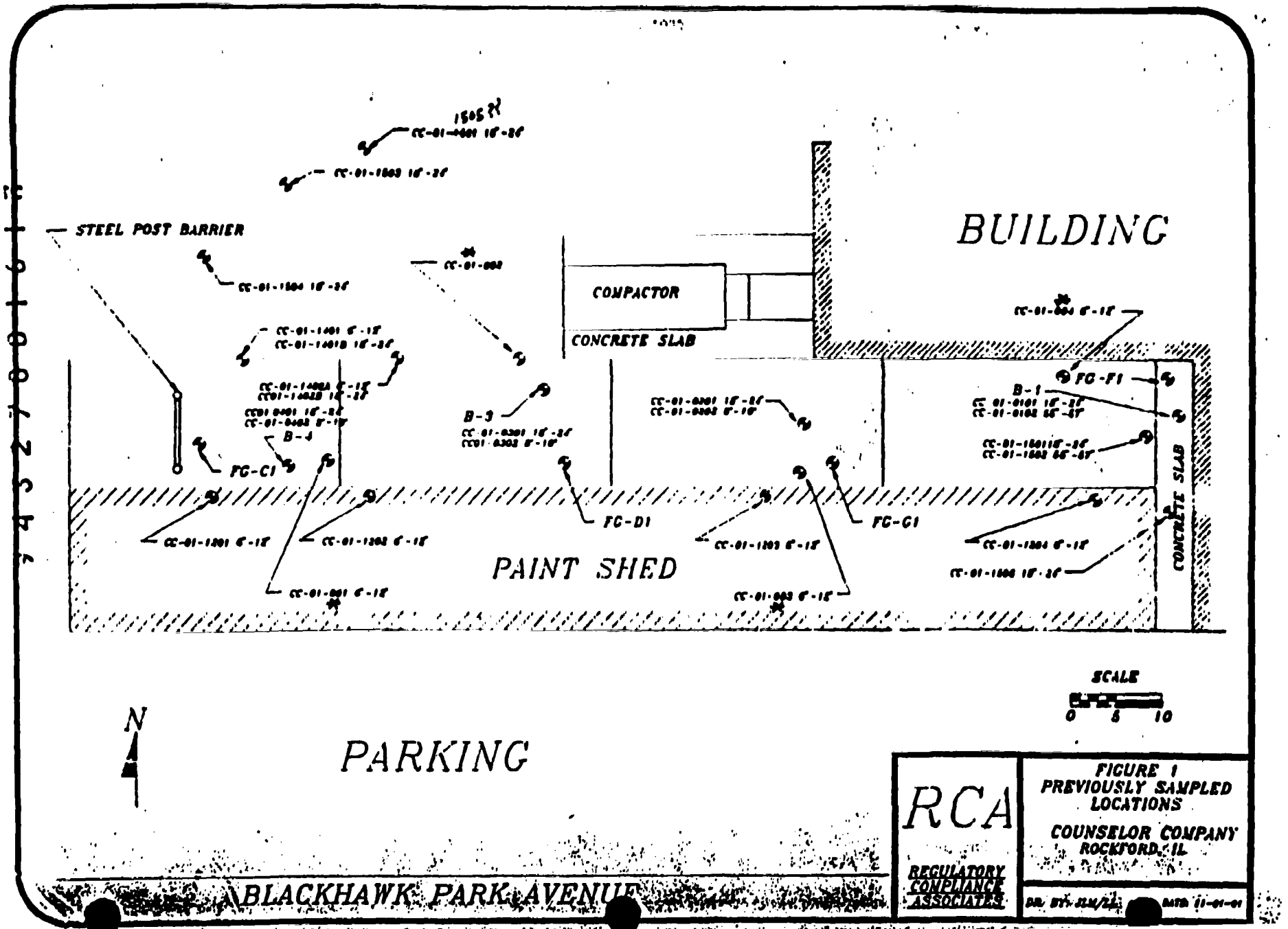


Figure 7: Outdoor Waste Paint and Solvent Storage Area (SWMU 1) confirmatory soil samples locations.

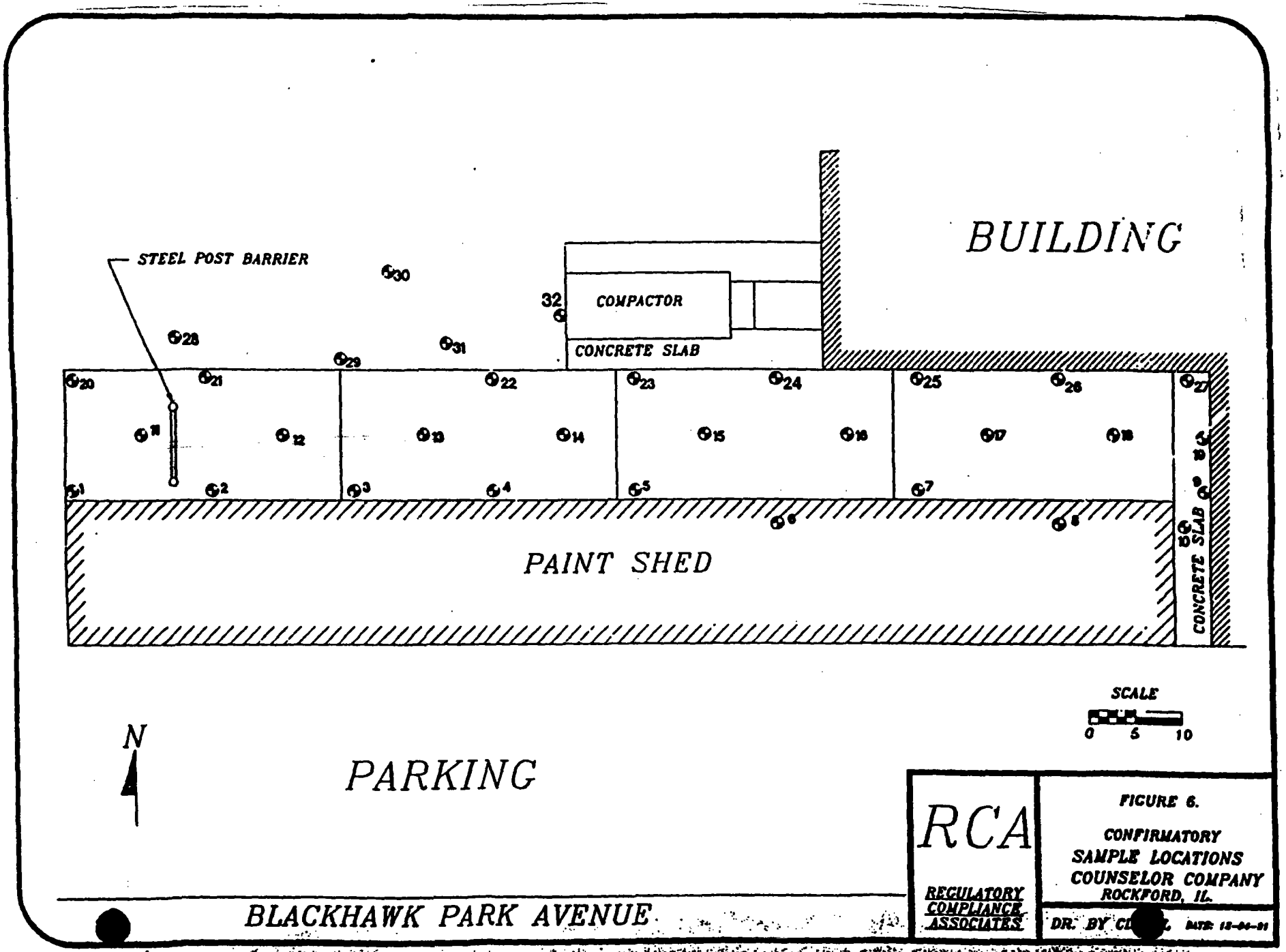


Figure 8: Proposed (and assumed executed) areas of excavation for Outdoor Waste Paint and Solvent Storage Area (SWMU 1.)

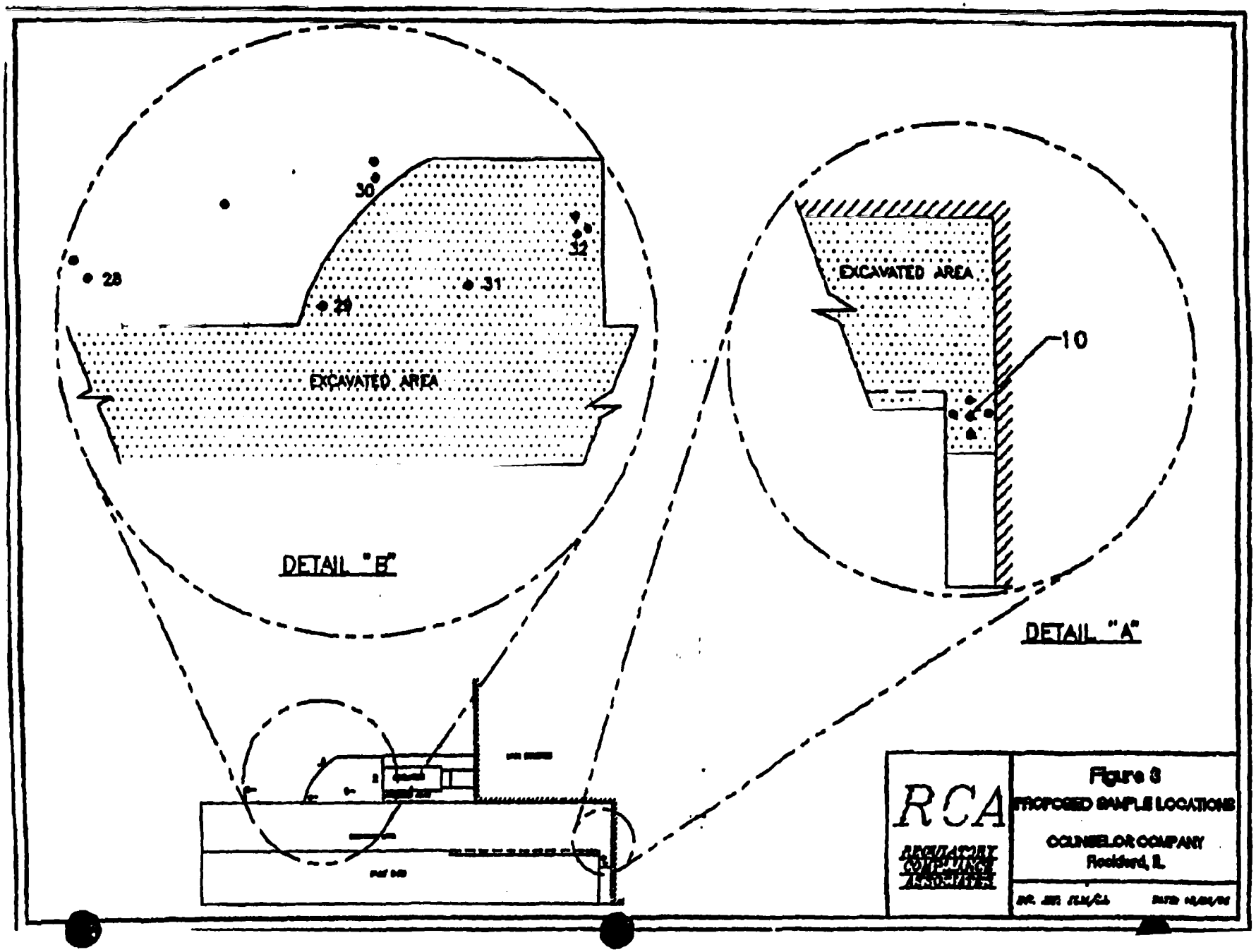
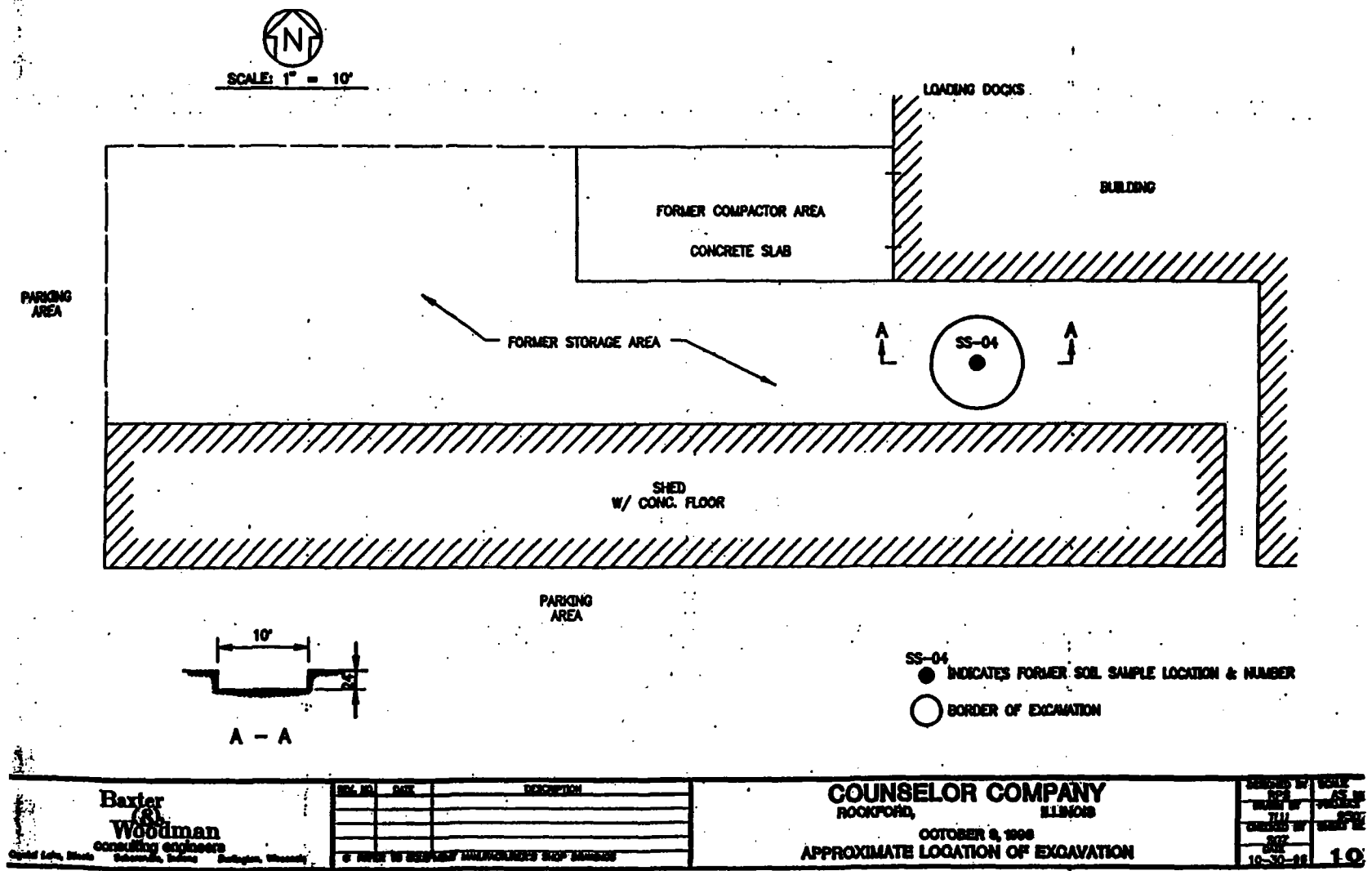


Figure 9: Area of October 9, 1996 excavation for Outdoor Waste Paint and Solvent Storage Area (SWMU 1.)



Data Sheet 1: Analytical Reports for soil samples taken from the excavation pit for the 2,000 Gallon Waste Oil UST (SWMU 3.)

ANALYTICAL REPORT

Mr. Rand Eriberian
COUNSELOR COMPANY
2107 Kishwaukee Street
Rockford IL 61108

07-06-08

Sample No: 08004

SAMPLE DESCRIPTION: 2000 Gal. UST Soil Composite

Date Taken: 06-17-08 1100

Date Received: 06-17-08 1134

VOLATILE COMPOUNDS

Acrolein	<200.	ug/g
Acrylonitrile	<200.	ug/g
Benzene	<5.0	ug/g
Bromodichloroethane	<5.0	ug/g
Bromoform	<5.0	ug/g
Bromomethane	<200.	ug/g
Carbon tetrachloride	<5.0	ug/g
Chlorobenzene	<5.0	ug/g
Chloroethane	<200.	ug/g
2-Chloroethyl vinyl ether	<5.0	ug/g
Chloroform	<5.0	ug/g
Chloromethane	<200.	ug/g
Dibromochloromethane	<5.0	ug/g
1,2-Dichlorobenzene	<5.0	ug/g
1,3-Dichlorobenzene	<5.0	ug/g
1,4-Dichlorobenzene	<5.0	ug/g
1,1-Dichloroethane	<5.0	ug/g
1,2-Dichloroethane	<5.0	ug/g
1,1-Dichloroethene	<5.0	ug/g
trans-1,2-Dichloroethene	<5.0	ug/g
cis-1,2-Dichloroethene	<5.0	ug/g
1,2-Dichloropropane	<5.0	ug/g
cis-1,3-Dichloropropene	<5.0	ug/g
trans-1,3-Dichloropropene	<5.0	ug/g
Ethylbenzene	<5.0	ug/g

cc: Randy Olson/FIU

Todd Gartner, Manager
Rockford Division

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NET NATIONAL ENVIRONMENTAL TESTING, INC.

ANALYTICAL REPORT

Mr. Rand Eriberian
COUNSELOR COMPANY
2107 Kishwaukee Street
Rockford IL 61108

07-06-08

Sample No: 08004

SAMPLE DESCRIPTION: 2000 Gal. UST Soil Composite

Date Taken: 06-17-08 1100

Date Received: 06-17-08 1134

Reactive Cyanide	<0.008	ug/g
EP Tox - Arsenic	<0.001	mg/l
EP Tox - Barium	<0.01	mg/l
EP Tox - Cadmium	0.020	mg/l
EP Tox - Chromium	0.012	mg/l
EP Tox - Lead	0.13	mg/l
EP Tox - Mercury	<0.001	mg/l
EP Tox - Selenium	<0.001	mg/l
EP Tox - Silver	0.006	mg/l

cc: Randy Olson/FIU

Todd Gartner, Manager
Rockford Division

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ANALYTICAL REPORT

Mr. Rand Eriberian
COUNSELOR COMPANY
2107 Kishwaukee Street
Rockford IL 61108

07-06-08

Sample No: 08004

SAMPLE DESCRIPTION: 2000 Gal. UST Soil Composite

Date Taken: 06-17-08 1100

Date Received: 06-17-08 1

VOLATILE COMPOUNDS

Methylene chloride	<200.	ug/g
1,1,2,2-Tetrachloroethane	<5.0	ug/g
Tetrachloroethene	<5.0	ug/g
Toluene	<5.0	ug/g
1,1,1-Trichloroethane	<5.0	ug/g
1,1,2-Trichloroethane	<5.0	ug/g
Trichloroethene	<5.0	ug/g
Vinyl chloride	<200.	ug/g
Xylenes	<5.0	ug/g

cc: Randy Olson/FIU

Todd Gartner, Manager
Rockford Division

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DS 1

Data Sheet 2: Ally Storage Area (SWMU 2) soil sample analytical reports.

NATIONAL ENVIRONMENTAL TESTING, INC.
NET Midwest, Inc.
Rockford Division
3640 26th Street
Rockford, IL 61109
Tel: (815) 874-5171
Fax: (815) 874-5602

ANALYTICAL REPORT

Mr. Jeff Meyer
FEHR-GRAHAM & ASSOCIATES
660 W. Stephenson Street
Freeport IL 61032

04-27-90
Sample No: 72576
Project No. 930158

SAMPLE DESCRIPTION: 3790-A1, Grab Soil

Date Taken: 04-16-90 1115 Date Received: 04-16-90 1422

VOLATILE COMPOUNDS

Acrolein	<10000.	ng/g
Acrylonitrile	<10000.	ng/g
Benzene	<1000.	ng/g
Bromodichloromethane	<1000.	ng/g
Bromoform	<1000.	ng/g
Bromomethane	<10000.	ng/g
Carbon tetrachloride	<1000.	ng/g
Chlorobenzene	<1000.	ng/g
Chloroethane	<10000.	ng/g
2-Chloroethyl vinyl ether	<2000.	ng/g
Chloroform	<1000.	ng/g
Chloromethane	<10000.	ng/g
Dibromochloromethane	<1000.	ng/g
1,2-Dichlorobenzene	<1000.	ng/g
1,3-Dichlorobenzene	<1000.	ng/g
1,4-Dichlorobenzene	<1000.	ng/g
1,1-Dichloroethane	<1000.	ng/g
1,2-Dichloroethane	<1000.	ng/g
1,1-Dichloroethene	2000.	ng/g
trans-1,2-Dichloroethene	<1000.	ng/g
cis-1,2-Dichloroethene	<1000.	ng/g
1,2-Dichloropropane	<1000.	ng/g
cis-1,3-Dichloropropene	<1000.	ng/g
trans-1,3-Dichloropropene	<1000.	ng/g
Ethylbenzene	<1000.	ng/g
Methyl ethyl ketone	<1000.	ng/g
Methyl isobutyl ketone	<1000.	ng/g
Methylene chloride	<5000.	ng/g
1,1,2,2-Tetrachloroethane	<1000.	ng/g
Tetrachloroethene	2000.	ng/g
Toluene	<1000.	ng/g
1,1,1-Trichloroethane	89000.	ng/g
1,1,2-Trichloroethane	<1000.	ng/g
Trichloroethene	<1000.	ng/g
Vinyl chloride	<10000.	ng/g

Brian Wanner, Manager
Rockford Division

NATIONAL ENVIRONMENTAL TESTING, INC.

ANALYTICAL REPORT

Mr. Jeff Meyer
FEHR-GRAHAM & ASSOCIATES
660 W. Stephenson Street
Freeport IL 61032

04-27-90
Sample No: 72576
Project No. 930158

SAMPLE DESCRIPTION: 3790-A1, Grab Soil

Date Taken: 04-16-90 1115 Date Received: 04-16-90 1422

Xylenes	<1000.	ng/g

Brian Wanner, Manager
Rockford Division

NATIONAL ENVIRONMENTAL TESTING, INC.

ANALYTICAL REPORT

Mr. Jeff Meyer
FEHR-GRAHAM & ASSOCIATES
660 W. Stephenson Street
Freeport IL 61032

04-27-90
Sample No: 72577
Project No. 930158

SAMPLE DESCRIPTION: 3791-B1, Grab Soil

Date Taken: 04-16-90 1140 Date Received: 04-16-90 1422

VOLATILE COMPOUNDS

Acrolein	<10000.	ng/g
Acrylonitrile	<10000.	ng/g
Benzene	<1000.	ng/g
Bromodichloromethane	<1000.	ng/g
Bromoform	<1000.	ng/g
Bromomethane	<10000.	ng/g
Carbon tetrachloride	<1000.	ng/g
Chlorobenzene	<1000.	ng/g
Chloroethane	<10000.	ng/g
2-Chloroethyl vinyl ether	<2000.	ng/g
Chloroform	<1000.	ng/g
Chloromethane	<10000.	ng/g
Dibromochloromethane	<1000.	ng/g
1,2-Dichlorobenzene	<1000.	ng/g
1,3-Dichlorobenzene	<1000.	ng/g
1,4-Dichlorobenzene	<1000.	ng/g
1,1-Dichloroethane	<1000.	ng/g
1,2-Dichloroethane	<1000.	ng/g
1,1-Dichloroethene	<1000.	ng/g
trans-1,2-Dichloroethene	<1000.	ng/g
cis-1,2-Dichloroethene	<1000.	ng/g
1,2-Dichloropropane	<1000.	ng/g
cis-1,3-Dichloropropene	<1000.	ng/g
trans-1,3-Dichloropropene	<1000.	ng/g
Ethylbenzene	<1000.	ng/g
Methyl ethyl ketone	<1000.	ng/g
Methyl isobutyl ketone	<1000.	ng/g
Methylene chloride	<5000.	ng/g
1,1,2,2-Tetrachloroethane	<1000.	ng/g
Tetrachloroethene	<1000.	ng/g
Toluene	<1000.	ng/g
1,1,1-Trichloroethane	4700.	ng/g
1,1,2-Trichloroethane	<1000.	ng/g
Trichloroethene	<1000.	ng/g
Vinyl chloride	<10000.	ng/g

Brian Wanner, Manager
Rockford Division

NATIONAL ENVIRONMENTAL TESTING, INC.

ANALYTICAL REPORT

Mr. Jeff Meyer
FEHR-GRAHAM & ASSOCIATES
660 W. Stephenson Street
Freeport IL 61032

04-27-90
Sample No: 72577
Project No. 930158

SAMPLE DESCRIPTION: 3791-B1, Grab Soil

Date Taken: 04-16-90 1140 Date Received: 04-16-90 1422

Xylenes	<1000.	ng/g

Brian Wanner, Manager
Rockford Division

Data Sheet 3: Soil sample analysis reports for the Outdoor Waste Paint and Solvent Storage Area (SWMU 1.)

ANALYTICAL REPORT

Mr. Jeff Meyer
Fehr-Graham & Associates
660 W. Stephenson Street
Freeport IL 61032

04-27-90
Sample No: 72578
Project No. f30158

SAMPLE DESCRIPTION: 3793-C1, Grab Soil

Date Taken: 04-16-90 1210 Date Received: 04-16-90 1422

VOLATILE COMPOUNDS

Acrolein	<50.	ug/g
Acrylonitrile	<50.	ug/g
Benzene	<5.0	ug/g
Bromodichloromethane	<5.0	ug/g
Bromoform	<5.0	ug/g
Bromomethane	<50.	ug/g
Carbon tetrachloride	<5.0	ug/g
Chlorobenzene	<5.0	ug/g
Chloroethane	<50.	ug/g
2-Chloroethyl vinyl ether	<10.	ug/g
Chloroform	<5.0	ug/g
Chloromethane	<50.	ug/g
Dibromochloromethane	<5.0	ug/g
1,2-Dichlorobenzene	<5.0	ug/g
1,3-Dichlorobenzene	<5.0	ug/g
1,4-Dichlorobenzene	<5.0	ug/g
1,1-Dichloroethane	<5.0	ug/g
1,2-Dichloroethane	<5.0	ug/g
1,1-Dichloroethene	<5.0	ug/g
trans-1,2-Dichloroethene	<5.0	ug/g
cis-1,2-Dichloroethene	<5.0	ug/g
1,2-Dichloropropane	<5.0	ug/g
cis-1,3-Dichloropropene	<5.0	ug/g
trans-1,3-Dichloropropene	<5.0	ug/g
Ethylbenzene	<5.0	ug/g
Methyl ethyl ketone	<5.0	ug/g
Methyl isobutyl ketone	<5.0	ug/g
Methylene chloride	<25.	ug/g
1,1,2,2-Tetrachloroethane	<5.0	ug/g
Tetrachloroethene	13.	ug/g
Toluene	<5.0	ug/g
1,1,1-Trichloroethane	60.	ug/g
1,1,2-Trichloroethane	<5.0	ug/g
Trichloroethene	17.	ug/g
Vinyl chloride	<50.	ug/g

Brian Wanner, Manager
Rockford Division

ANALYTICAL REPORT

Mr. Jeff Meyer
Fehr-Graham & Associates
660 W. Stephenson Street
Freeport IL 61032

04-27-90
Sample No: 72578
Project No. f30158

SAMPLE DESCRIPTION: 3793-C1, Grab Soil

Date Taken: 04-16-90 1210 Date Received: 04-16-90 1[illegible]

Xylenes	<5.0	ug/g

Brian Wanner, Manager
Rockford Division

NET NATIONAL ENVIRONMENTAL TESTING, INC.

NET Midwest, Inc.
Rockford Division
[illegible]

ANALYTICAL REPORT

Mr. Jeff Meyer
Fehr-Graham & Associates
660 W. Stephenson Street
Freeport IL 61032

SAMPLE DESCRIPTION: 3793-B1, Grab So[il]

Date Taken: 04-16-90 1230 1422

VOLATILE COMPO[UNDS]

DS3

Acrolein	<50.	
Acrylonitrile	<50.	
Benzene	<5.0	
Bromodichloromethane	<5.0	
Bromoform	<5.0	
Bromomethane	<50.	
Carbon tetrachloride	<5.0	
Chlorobenzene	<5.0	
Chloroethane	<50.	
2-Chloroethyl vinyl ether	<10.	
Chloroform	<5.0	
Chloromethane	<50.	
Dibromochloromethane	<5.0	
1,2-Dichlorobenzene	<5.0	ug/g
1,3-Dichlorobenzene	<5.0	ug/g
1,4-Dichlorobenzene	<5.0	ug/g
1,1-Dichloroethane	<5.0	ug/g
1,2-Dichloroethane	<5.0	ug/g
1,1-Dichloroethene	<5.0	ug/g
trans-1,2-Dichloroethene	<5.0	ug/g
cis-1,2-Dichloroethene	7.5	ug/g
1,2-Dichloropropane	<5.0	ug/g
cis-1,3-Dichloropropene	<5.0	ug/g
trans-1,3-Dichloropropene	<5.0	ug/g
Ethylbenzene	<5.0	ug/g
Methyl ethyl ketone	<5.0	ug/g
Methyl isobutyl ketone	<5.0	ug/g
Methylene chloride	<25.	ug/g
1,1,2,2-Tetrachloroethane	<5.0	ug/g
Tetrachloroethene	30.	ug/g
Toluene	<5.0	ug/g
1,1,1-Trichloroethane	140.	ug/g
1,1,2-Trichloroethane	<5.0	ug/g
Trichloroethene	17.	ug/g
Vinyl chloride	<50.	ug/g

Brian Wanner, Manager
Rockford Division

NET NATIONAL ENVIRONMENTAL TESTING, INC.

NET Midwest, Inc.
Rockford Division
[illegible]

ANALYTICAL REPORT

Mr. Jeff Meyer
Fehr-Graham & Associates
660 W. Stephenson Street
Freeport IL 61032

04-27-90
Sample No: 72579
Project No. f30158

SAMPLE DESCRIPTION: 3793-B1, Grab Soil

Date Taken: 04-16-90 1230 Date Received: 04-16-90 14[illegible]

Xylenes	<5.0	ug/g

Brian Wanner, Manager
Rockford Division

Data Sheet 4: Soil sample analysis reports for the Outdoor Waste Paint and Solvent Storage Area (SWMU 1.)

ANALYTICAL REPORT

Mr. Jeff Meyer
FEHR-GRAHAM & ASSOCIATES
660 W. Stephenson Street
Freeport IL 61032

04-27-90
Sample No: 72580
Project No. 930158

SAMPLE DESCRIPTION: 3794-B1, Grab Soil

Date Taken: 04-16-90 1225 Date Received: 04-16-90 1422

VOLATILE COMPOUNDS

Acrolein	<50.	ng/g
Acrylonitrile	<50.	ng/g
Benzene	<5.0	ng/g
Bromodichloromethane	<5.0	ng/g
Bromoform	<5.0	ng/g
Bromomethane	<50.	ng/g
Carbon tetrachloride	<5.0	ng/g
Chlorobenzene	<5.0	ng/g
Chloroethane	<50.	ng/g
2-Chloroethyl,vinyl ether	<10.	ng/g
Chloroform	<5.0	ng/g
Chloromethane	<50.	ng/g
Dibromochloromethane	<5.0	ng/g
1,2-Dichlorobenzene	<5.0	ng/g
1,3-Dichlorobenzene	<5.0	ng/g
1,4-Dichlorobenzene	<5.0	ng/g
1,1-Dichloroethane	<5.0	ng/g
1,2-Dichloroethane	<5.0	ng/g
1,1-Dichloroethene	<5.0	ng/g
trans-1,2-Dichloroethene	<5.0	ng/g
cis-1,2-Dichloroethene	<5.0	ng/g
1,2-Dichloropropane	<5.0	ng/g
cis-1,3-Dichloropropene	<5.0	ng/g
trans-1,3-Dichloropropene	<5.0	ng/g
Ethylbenzene	<5.0	ng/g
Methyl ethyl ketone	25.	ng/g
Methyl isobutyl ketone	<5.0	ng/g
Methylene chloride	<25.	ng/g
1,1,2,2-Tetrachloroethane	<5.0	ng/g
Tetrachloroethene	9.0	ng/g
Toluene	<5.0	ng/g
1,1,1-Trichloroethane	19.	ng/g
1,1,2-Trichloroethane	<5.0	ng/g
Trichloroethene	<5.0	ng/g
Vinyl chloride	<50.	ng/g

Brian Wanner, Manager
Rockford Division

ANALYTICAL REPORT

Mr. Jeff Meyer
FEHR-GRAHAM & ASSOCIATES
660 W. Stephenson Street
Freeport IL 61032

04-27-90
Sample No: 72580
Project No. 930158

SAMPLE DESCRIPTION: 3794-B1, Grab Soil

Date Taken: 04-16-90 1225 Date Received: 04-16-90 1422

Xylenes	5.0	ng/g	10,060

Brian Wanner, Manager
Rockford Division

NET NATIONAL ENVIRONMENTAL TESTING, INC.

NET Midwest, Inc.
Rockford Division
3648 26th Street
Rockford, IL 61109
Tel: (815) 874-2171
Fax: (815) 874-6852

ANALYTICAL REPORT

Mr. Jeff Meyer
FEHR-GRAHAM & ASSOCIATES
660 W. Stephenson Street
Freeport IL 61032

04-27-90
Sample No: 72581
Project No. 930158

SAMPLE DESCRIPTION: 3795-G1, Grab Soil

Date Taken: 04-16-90 1230 Date Received: 04-16-90 1422

VOLATILE COMPOUNDS

Acrolein	<10000.	ng/g
Acrylonitrile	<10000.	ng/g
Benzene	<1000.	ng/g
Bromodichloromethane	<1000.	ng/g
Bromoform	<1000.	ng/g
Bromomethane	<10000.	ng/g
Carbon tetrachloride	<1000.	ng/g
Chlorobenzene	<1000.	ng/g
Chloroethane	<10000.	ng/g
2-Chloroethyl vinyl ether	<2000.	ng/g
Chloroform	<1000.	ng/g
Chloromethane	<10000.	ng/g
Dibromochloromethane	<1000.	ng/g
1,2-Dichlorobenzene	<1000.	ng/g
1,3-Dichlorobenzene	<1000.	ng/g
1,4-Dichlorobenzene	<1000.	ng/g
1,1-Dichloroethane	<1000.	ng/g
1,2-Dichloroethane	<1000.	ng/g
1,1-Dichloroethene	<1000.	ng/g
trans-1,2-Dichloroethene	<1000.	ng/g
cis-1,2-Dichloroethene	<1000.	ng/g
1,2-Dichloropropane	<1000.	ng/g
cis-1,3-Dichloropropene	<1000.	ng/g
trans-1,3-Dichloropropene	<1000.	ng/g
Ethylbenzene	<1000.	ng/g
Methyl ethyl ketone	<1000.	ng/g
Methyl isobutyl ketone	<1000.	ng/g
Methylene chloride	<5000.	ng/g
1,1,2,2-Tetrachloroethane	<1000.	ng/g
Tetrachloroethene	<1000.	ng/g
Toluene	<1000.	ng/g
1,1,1-Trichloroethane	<1000.	ng/g
1,1,2-Trichloroethane	<1000.	ng/g
Trichloroethene	<1000.	ng/g
Vinyl chloride	<10000.	ng/g

*High VOC detection limit due to hydrocarbon interference.

Brian Wanner, Manager
Rockford Division

NET NATIONAL ENVIRONMENTAL TESTING, INC.

NET Midwest, Inc.
Rockford Division
3648 26th Street
Rockford, IL 61109
Tel: (815) 874-2171
Fax: (815) 874-6852

ANALYTICAL REPORT

Mr. Jeff Meyer
FEHR-GRAHAM & ASSOCIATES
660 W. Stephenson Street
Freeport IL 61032

04-27-90
Sample No: 72581
Project No. 930158

SAMPLE DESCRIPTION: 3795-G1, Grab Soil

Date Taken: 04-16-90 1230 Date Received: 04-16-90 1422

Xylenes	<1000.	ng/g

*High VOC detection limit due to hydrocarbon interference.

Brian Wanner, Manager
Rockford Division

Data Sheet 5: Soil sample analysis reports for the Outdoor Waste Paint and Solvent Storage Area (SWMU 1.)

ANALYTICAL REPORT

Mr. Jeff Meyer
Fehr-Graham & Associates
600 W. Stephenson Street
Freeport IL 61032

04-27-90
Sample No: [illegible]
Project No. [illegible]

SAMPLE DESCRIPTION: 3796-F1, Grab Soil

Date Taken: 04-16-90 1236 Date Received: 04-16-90 1422

VOLATILE COMPOUNDS

Acrolein	<20.	ug/kg
Acrylonitrile	<20.	ug/kg
Benzene	<5.0	ug/kg
Bromodichloromethane	<5.0	ug/kg
Bromoform	<5.0	ug/kg
Bromomethane	<20.	ug/kg
Carbon tetrachloride	<5.0	ug/kg
Chlorobenzene	<5.0	ug/kg
Chloroethane	<20.	ug/kg
2-Chloroethyl vinyl ether	<10.	ug/kg
Chloroform	<5.0	ug/kg
Chloromethane	<20.	ug/kg
Dibromochloromethane	<5.0	ug/kg
1,2-Dichlorobenzene	<5.0	ug/kg
1,3-Dichlorobenzene	<5.0	ug/kg
1,4-Dichlorobenzene	<5.0	ug/kg
1,1-Dichloroethane	<5.0	ug/kg
1,2-Dichloroethane	<5.0	ug/kg
1,1-Dichloroethene	<5.0	ug/kg
trans-1,2-Dichloroethene	<5.0	ug/kg
cis-1,2-Dichloroethene	<5.0	ug/kg
1,2-Dichloropropane	<5.0	ug/kg
cis-1,3-Dichloropropene	<5.0	ug/kg
trans-1,3-Dichloropropene	<5.0	ug/kg
Ethylbenzene	<5.0	ug/kg
Methyl ethyl ketone	<5.0	ug/kg
Methyl isobutyl ketone	<5.0	ug/kg
Methylene chloride	<25.	ug/kg
1,1,2,2-Tetrachloroethane	<5.0	ug/kg
Tetrachloroethene	7.0	ug/kg
Toluene	11.	ug/kg
1,1,1-Trichloroethane	20.	ug/kg
1,1,2-Trichloroethane	<5.0	ug/kg
Trichloroethene	<5.0	ug/kg
Vinyl chloride	<20.	ug/kg

Brian Wanner, Manager
Rockford Division

ANALYTICAL REPORT

Mr. Jeff Meyer
Fehr-Graham & Associates
600 W. Stephenson Street
Freeport IL 61032

04-27-90
Sample No: [illegible]
Project No. [illegible]

SAMPLE DESCRIPTION: 3796-F1, Grab Soil

Date Taken: 04-16-90 1236 Date Received: 04-16-9[illegible]

Xylenes	16.	ug/kg

Brian Wanner, Manager
Rockford Division

Data Sheet 6: July 18, 1990 Ally Storage Area soil sample analysis results (locations are indicated in Figure 5.)

An Environmental Testing and Consulting Service Company

4620 INDUSTRIAL DRIVE
SPRINGFIELD, ILLINOIS 62703
(217) 529-5191

CLIENT: COUNSELOR CO.
DATE RECEIVED: 08/02/90
SAMPLE DESCRIPTION: 0069-90
LAB NO.: 5967-90
REPORT DATE: 08/10/90

Compound Name (Method 8240)	Detection Limit ug/kg (PPB)	Result ug/kg (PPB)
Chloromethane	10	10
Bromomethane	10	10
Vinyl Chloride	10	10
Chloroethane	10	10
Methylene Chloride	5	5
Acetone	100	100
Carbon Disulfide	5	5
1,1-Dichloroethene	5	5
1,1-Dichloroethane	5	5
trans-1,2-Dichloroethene	5	5
Chloroform	5	5
1,2-Dichloroethane	5	5
2-Butanone	100	100
1,1,1-Trichloroethane	5	5
Carbon Tetrachloride	5	5
Vinyl Acetate	50	50
Bromodichloromethane	5	5
1,1,2,2-Tetrachloroethane	5	5
1,2-Dichloropropane	5	5
trans-1,3-Dichloropropene	5	5
Trichloroethene	5	5
Dibromochloromethane	5	5
1,1,2-Trichloroethane	5	5
Benzene	5	5
cis-1,3-Dichloropropene	5	10
2-Chloroethyl Vinyl Ether	10	5
Bromoform	5	50
2-Hexone	50	50
4-Methyl 1-2-pentanone	50	5
Tetrachloroethene	5	

Gerald O. Mack
Chief Scientist
DTC Laboratories, Inc.

An Environmental Testing and Consulting Service Company

4620 INDUSTRIAL DRIVE
SPRINGFIELD, ILLINOIS 62703
(217) 529-5191

ANALYTICAL REPORT

CLIENT: COUNSELOR CO.
DATE RECEIVED: 08/02/90
SAMPLE DESCRIPTION: 0069-90
LAB NO.: 5967-90
REPORT DATE: 08/10/90

Compound Name (Method 8240)	Detection Limit ug/kg (PPB)	Result ug/kg (PPB)
Toluene	5	5
Chlorobenzene	5	5
Ethyl Benzene	5	5
Styrene	5	5
Total Xylenes	5	5

Gerald O. Mack
Chief Scientist
DTC Laboratories, Inc.

DTC Laboratories, Inc.

An Environmental Testing and Consulting Service Company

4620 INDUSTRIAL DRIVE
SPRINGFIELD, ILLINOIS 62703
(217) 529-5191

CLIENT: COUNSELOR CO.
DATE RECEIVED: 08/02/90
SAMPLE DESCRIPTION: 0070-90
LAB NO.: 5968-90
REPORT DATE: 08/10/90

Compound Name (Method 8240)	Detection Limit ug/kg (PPB)	Result ug/kg (PPB)
Chloromethane	10	10
Bromomethane	10	10
Vinyl Chloride	10	10
Chloroethane	10	10
Methylene Chloride	5	5
Acetone	100	100
Carbon Disulfide	5	5
1,1-Dichloroethene	5	5
1,1-Dichloroethane	5	5
trans-1,2-Dichloroethene	5	5
Chloroform	5	5
1,2-Dichloroethane	5	5
2-Butanone	100	100
1,1,1-Trichloroethane	5	5
Carbon Tetrachloride	5	5
Vinyl Acetate	50	50
Bromodichloromethane	5	5
1,1,2,2-Tetrachloroethane	5	5
1,2-Dichloropropane	5	5
trans-1,3-Dichloropropene	5	5
Trichloroethene	5	5
Dibromochloromethane	5	5
1,1,2-Trichloroethane	5	5
Benzene	5	5
cis-1,3-Dichloropropene	5	10
2-Chloroethyl Vinyl Ether	10	5
Bromoform	5	50
2-Hexone	50	50
4-Methyl 1-2-pentanone	50	5
Tetrachloroethene	5	

Gerald O. Mack
Chief Scientist
DTC Laboratories, Inc.

DTC Laboratories, Inc.

An Environmental Testing and Consulting Service Company

4620 INDUSTRIAL DRIVE
SPRINGFIELD, ILLINOIS 62703
(217) 529-5191

ANALYTICAL REPORT

CLIENT: COUNSELOR CO.
DATE RECEIVED: 08/02/90
SAMPLE DESCRIPTION: 0070-90
LAB NO.: 5968-90
REPORT DATE: 08/10/90

Compound Name (Method 8240)	Detection Limit ug/kg (PPB)	Result ug/kg (PPB)
Toluene	5	5
Chlorobenzene	5	5
Ethyl Benzene	5	5
Styrene	5	5
Total Xylenes	5	5

Gerald O. Mack
Chief Scientist
DTC Laboratories, Inc.

Data Sheet 7: July 18, 1990 Ally Storage Area soil sample analysis results (locations are indicated in Figure 5.)

An Environmental Testing and Consulting Service Company

CLIENT: CORNELIUS CO.
DATE RECEIVED: 06/02/90
SAMPLE DESCRIPTION: 0871-90
LAB NO.: 5969-90
REPORT DATE: 06/10/90

Compound Name (Method 8240)	Detection Limit ug/kg (PPB)	Result ug/kg (PPB)
Chloromethane	10	10
Bromomethane	10	10
Vinyl Chloride	10	10
Chloroethane	10	10
Methylene Chloride	5	5
Acetone	100	100
Carbon Disulfide	5	5
1,1-Dichloroethene	5	5
1,1-Dichloroethane	5	5
trans-1,2-Dichloroethene	5	5
Chloroform	5	5
1,2-Dichloroethane	5	5
2-Butanone	100	100
1,1,1-Trichloroethane	5	5
Carbon Tetrachloride	5	5
Vinyl Acetate	50	50
Bromodichloromethane	5	5
1,1,2,2-Tetrachloroethane	5	5
1,2-Dichloropropane	5	5
trans-1,3-Dichloropropene	5	5
Trichloroethene	5	5
Dibromochloromethane	5	5
1,1,2-Trichloroethane	5	5
Benzene	5	5
cis-1,3-Dichloropropene	5	5
2-Chloroethyl Vinyl Ether	10	10
Bromoform	5	5
2-Hexanone	50	50
4-Methyl 1-2-pentanone	50	50
Tetrachloroethene	5	5

Gerald G. Nash
Chief Scientist
DTC Laboratories, Inc.

An Environmental Testing and Consulting Service Company

ANALYTICAL REPORT

CLIENT: CORNELIUS CO.
DATE RECEIVED: 06/02/90
SAMPLE DESCRIPTION: 0871-90
LAB NO.: 5969-90
REPORT DATE: 06/10/90

Compound Name (Method 8240)	Detection Limit ug/kg (PPB)	Result ug/kg (PPB)
Toluene	5	5
Chlorobenzene	5	5
Ethyl Benzene	5	5
Styrene	5	5
Total Xylenes	5	5

Gerald G. Nash
Chief Scientist
DTC Laboratories, Inc.

DTC Laboratories, Inc.

An Environmental Testing and Consulting Service Company

CLIENT: CORNELIUS CO.
DATE RECEIVED: 06/02/90
SAMPLE DESCRIPTION: 0872-90
LAB NO.: 5970-90
REPORT DATE: 06/10/90

Compound Name (Method 8240)	Detection Limit ug/kg (PPB)	Result ug/kg (PPB)
Chloromethane	10	10
Bromomethane	10	10
Vinyl Chloride	10	10
Chloroethane	10	10
Methylene Chloride	5	5
Acetone	100	100
Carbon Disulfide	5	5
1,1-Dichloroethene	5	5
1,1-Dichloroethane	5	5
trans-1,2-Dichloroethene	5	5
Chloroform	5	5
1,2-Dichloroethane	5	5
2-Butanone	100	100
1,1,1-Trichloroethane	5	5
Carbon Tetrachloride	5	5
Vinyl Acetate	50	50
Bromodichloromethane	5	5
1,1,2,2-Tetrachloroethane	5	5
1,2-Dichloropropane	5	5
trans-1,3-Dichloropropene	5	5
Trichloroethene	5	5
Dibromochloromethane	5	5
1,1,2-Trichloroethane	5	5
Benzene	5	5
cis-1,3-Dichloropropene	5	5
2-Chloroethyl Vinyl Ether	10	10
Bromoform	5	5
2-Hexanone	50	50
4-Methyl 1-2-pentanone	50	50
Tetrachloroethene	5	5

Gerald G. Nash
Chief Scientist
DTC Laboratories, Inc.

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ANALYTICAL REPORT

CLIENT: CORNELIUS CO.
DATE RECEIVED: 06/02/90
SAMPLE DESCRIPTION: 0872-90
LAB NO.: 5970-90
REPORT DATE: 06/10/90

Compound Name (Method 8240)	Detection Limit ug/kg (PPB)	Result ug/kg (PPB)
Toluene	5	5
Chlorobenzene	5	5
Ethyl Benzene	5	5
Styrene	5	5
Total Xylenes	5	5

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Data Sheet 8: July 18, 1990 Ally Storage Area soil sample analysis results (locations are indicated in Figure 5.)

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4880 INDUSTRIAL DRIVE
SPRINGFIELD, ILLINOIS 62703
(217) 529-6181

CLIENT: COUNSELOR CO.
DATE RECEIVED: 08/02/90
SAMPLE DESCRIPTION: 0073-90
LAB NO.: 5971-90
REPORT DATE: 08/10/90

Compound Name (Method 8240)	Detection Limit ug/kg (PPB)	Result ug/kg (PPB)
Chloromethane	10	< 10
Bromomethane	10	< 10
Vinyl Chloride	10	< 10
Chloroethane	10	< 10
Methylene Chloride	5	< 5
Acetone	100	< 100
Carbon Disulfide	5	< 5
1,1-Dichloroethene	5	< 5
1,1-Dichloroethane	5	< 5
trans-1,2-Dichloroethene	5	< 5
Chloroform	5	< 5
1,2-Dichloroethane	5	< 5
2-Butanone	100	< 100
1,1,1-Trichloroethane	5	< 5
Carbon Tetrachloride	5	< 5
Vinyl Acetate	50	< 50
Bromodichloromethane	5	< 5
1,1,2,2-Tetrachloroethane	5	< 5
1,2-Dichloropropane	5	< 5
trans-1,3-Dichloropropene	5	< 5
Trichloroethene	5	< 5
Dibromochloromethane	5	< 5
1,1,2-Trichloroethane	5	< 5
Benzene	5	< 5
cis-1,3-Dichloropropene	5	< 5
2-Chloroethyl Vinyl Ether	10	< 10
Bromoform	5	< 5
2-Hexane	50	< 50
4-Methyl 1-2-pentanone	50	< 50
Tetrachloroethene	5	< 5

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ANALYTICAL REPORT

CLIENT: COUNSELOR CO.
DATE RECEIVED: 08/02/90
SAMPLE DESCRIPTION: 0073-90
LAB NO.: 5971-90
REPORT DATE: 08/10/90

Compound Name (Method 8240)	Detection Limit ug/kg (PPB)	Result ug/kg (PPB)
Toluene	5	< 5
Chlorobenzene	5	< 5
Ethyl Benzene	5	< 5
Styrene	5	< 5
Total Xylenes	5	< 5

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(217) 529-6181

CLIENT: COUNSELOR CO.
DATE RECEIVED: 08/02/90
SAMPLE DESCRIPTION: 0074-90
LAB NO.: 5972-90
REPORT DATE: 08/10/90

Compound Name (Method 8240)	Detection Limit ug/kg (PPB)	Result ug/kg (PPB)
Chloromethane	10	< 10
Bromomethane	10	< 10
Vinyl Chloride	10	< 10
Chloroethane	10	< 10
Methylene Chloride	5	< 5
Acetone	100	< 100
Carbon Disulfide	5	< 5
1,1-Dichloroethane	5	< 5
1,1-Dichloroethane	5	< 5
trans-1,2-Dichloroethene	5	< 5
Chloroform	5	< 5
1,2-Dichloroethane	5	< 5
2-Butanone	100	< 100
1,1,1-Trichloroethane	5	< 5
Carbon Tetrachloride	5	< 5
Vinyl Acetate	50	< 50
Bromodichloromethane	5	< 5
1,1,2,2-Tetrachloroethane	5	< 5
1,2-Dichloropropane	5	< 5
trans-1,3-Dichloropropene	5	< 5
Trichloroethene	5	< 5
Dibromochloromethane	5	< 5
1,1,2-Trichloroethane	5	< 5
Benzene	5	< 5
cis-1,3-Dichloropropene	5	< 10
2-Chloroethyl Vinyl Ether	10	< 5
Bromoform	5	< 50
2-Hexane	50	< 50
4-Methyl 1-2-pentanone	50	< 5
Tetrachloroethene	5	

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ANALYTICAL REPORT

CLIENT: COUNSELOR CO.
DATE RECEIVED: 08/02/90
SAMPLE DESCRIPTION: 0074-90
LAB NO.: 5972-90
REPORT DATE: 08/10/90

Compound Name (Method 8240)	Detection Limit ug/kg (PPB)	Result ug/kg (PPB)
Toluene	5	< 5
Chlorobenzene	5	< 5
Ethyl Benzene	5	< 5
Styrene	5	< 5
Total Xylenes	5	< 5

Gerald O. Mack
Chief Scientist
DTC Laboratories, Inc.